

Exhibit 1

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IN THE MATTER OF INDEPENDENT INVESTIGATION
UNDER EXECUTIVE LAW 63(8)

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5

May 19, 2021

6

1:00 p.m.

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VIDEOTAPED ZOOM TESTIMONY of Trooper #1

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Trooper #1, in the above-titled action,

11

pursuant to order and stipulations between

12

Counsel, before Anthony Giarro, a

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Registered Professional Reporter, a

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Certified Realtime Reporter and a Notary

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Public of the State of New York.

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A P P E A R A N C E S :

VLADECK, RASKIN & CLARK, PC

Attorneys Representing the New York

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(212) 403-7300

BY: ANNE CLARK, ESQ.

EMILY MILLER, ESQ.

GLEASON, DUNN, WALSH & O'SHEA

Attorneys for Witness

40 Beaver Street

Albany, New York 12207

BY: LISA F. JOSLIN, ESQ.

ALSO PRESENT:

GEOFF C. BASSETT, Videographer

1
2 THE VIDEOGRAPHER: Good
3 afternoon, everyone. This is the
4 videographer speaking, Geoffrey S.
5 Bassett, Veritext Legal Solutions.
6 Today's date is May 19th, 2021. And
7 the time is now 1 p.m. We are here
8 to take a remote video deposition of
9 Witness May 19th, 2021 in the matter
10 of Independent Investigation under
11 New York State Executive Law Section
12 63(8).

13 Would counsel please
14 introduce themselves for the record.

15 MS. CLARK: I'm Anne Clark.
16 I'm with the law firm of Vladeck,
17 Raskin & Clark. I'm here today on
18 behalf of the Attorney General's
19 Office.

20 MS. MILLER: I'm Emily
21 Miller, also with the law firm of
22 Vladeck, Raskin & Clark, and here on
23 behalf of the Attorney General's
24 Office as well.

25 MS. JOSLIN: I am Lisa

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Joslin from Gleason, Dunn, Walsh
O'Shea on behalf of the deponent.

THE VIDEOGRAPHER: Would the
court reporter please swear in the
witness.

[REDACTED] Trooper #1, after
having first been duly sworn by a Notary
Public of the State of New York, was
examined and testified as follows:

EXAMINATION BY

MS. CLARK:

Q Thank you for meeting with
us again today. I know I've introduced
myself a few times. But I'll do it
again.

My name is Anne Clark. Feel
free to call me Anne. I have been
appointed as a special deputy to the
First Deputy Attorney General. Emily
introduced herself. She's with my firm
and also appointed by the Attorney
General's Office. Our firm, Vladeck,
Raskin & Clark, and the law firm of
Cleary, Gottlieb, Steen & Hamilton have

Trooper #1 [REDACTED]

1
2 been appointed by the New York Attorney
3 General to conduct an independent
4 investigation under New York Executive
5 Law Section 63(8) into allegations of
6 sexual harassment brought against
7 Governor Andrew Cuomo, as well as the
8 surrounding circumstances. And you are
9 here today pursuant to a subpoena, issued
10 in connection with this investigation.

11 As you just heard from the
12 videographer, today's proceeding is being
13 video recorded. And there's also a court
14 reporter taking down what we say. You
15 are under oath, which means you must
16 testify truthfully and fully, just as if
17 you were in a court of law sitting in
18 front of a judge and jury. And your
19 testimony is subject to penalty of
20 perjury.

21 Under the Executive Law, if
22 at the end there's any statement that you
23 would like to make under oath, you're
24 welcome to do so. And I'll remind you at
25 the end if there's anything you want to

Trooper #1 Trooper #1

add, that you'll have that opportunity.

Although this is a civil investigation, the Attorney General's Office also has criminal enforcement powers. So you do have the right to refuse to answer a question if to do so would incriminate you; however, failure to answer can be used against you in a court of law in a civil non-criminal proceeding. You're here today with your attorney present. You may consult with your attorney about any privilege matters. But your attorney cannot otherwise make objections or interject.

And as you see, in addition to the videographer, we have a court reporter. And he needs to take down both my questions and your answers. So we'll get a transcript at the end. In order to have a clean record and make his job easier, it's very important that you give a verbal response. So if you gesture or shake your head or say uh-huh, it does not come out very well on the transcript.

Trooper #1 Trooper #1

I will do my very best to make sure -- sometimes there's a little lag with the video -- that you are finished answering before I ask my next question. And I would ask that even if you think you know where my question is heading that you let me get the whole question out because if we speak at the same time, it makes the court reporter's life very difficult.

If I ask a question and you don't understand it, let me know, and I'll try to rephrase it in a way that makes sense and just answer truthfully to the best of your ability. If you don't know something, just let us know that you don't know. Do you understand all that so far?

A Yes.

Q As we were discussing off the record before we started, you will not be permitted to review a transcript of this proceeding. But if at any time you want to clarify a question, even if it's something we talked about earlier,

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[REDACTED] [REDACTED]

just let me know now that we're talking about something else, it reminds you of something additional or you want to clarify something that you said before. If you need a break at any point, we can certainly take a break. I would just ask that you answer any pending questions before we take a break. And they'll be times that I might be asking you about very specific things, like names and dates. If you remember them, that's great. If you don't, I might ask you to approximate. So if you don't remember if it was May, if you remember that it was springtime, things along those lines.

And I just want to confirm that other than with your attorney, there's no one else in the room right now; is that correct?

A That's correct.

Q And can you confirm that neither you, nor your counsel are using any technology to create your own recording of this proceeding, including

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2 through any screen capturing tools?

3 A That's correct.

4 Q And I need to confirm that
5 neither you, nor your lawyer are allowing
6 anyone else to listen in, including
7 through any devices; is that correct?

8 A That's correct.

9 Q And we will also direct you
10 and your attorney not to communicate in
11 realtime or during breaks with anyone
12 about the substance of your testimony.

13 And I want to advise you
14 that under the Executive Law
15 Section 63(8), the provision under which
16 we're conducting this investigation, it
17 prohibits you and your attorney from
18 revealing anything about what we ask you
19 or what you testified about to anyone.
20 Obviously, the underlying events, it's up
21 to you whether you talk about them. But
22 in terms of saying whether we talked
23 about it, the law prohibits that. If at
24 any point anyone asks you what we talked
25 about -- and that includes anyone within

1 [REDACTED] [REDACTED]
2 your chain of command -- let Ms. Joslin
3 know, and she will let us know because
4 that would not be appropriate.

5 Are you on any medication
6 that would affect your ability to
7 understand my questions and testify
8 truthfully today?

9 A No medication.

10 Q Have you had any alcohol
11 today?

12 A No.

13 Q We usually ask that in the
14 morning depositions.

15 Is there any reason why you
16 wouldn't be able to answer my questions
17 fully and truthfully today?

18 A No reason.

19 Q For the record, could you
20 state your name, date of birth and
21 current home and business address?

22 A My name is Trooper #1 [REDACTED]

23 Trooper #1 Birthdate, [REDACTED].

24 Residence, [REDACTED] [REDACTED] [REDACTED] [REDACTED]

25 [REDACTED] [REDACTED] [REDACTED].

prepare for today, other than speak with
Ms. Joslin?

A Just review some dates that
I wrote down.

Q And those dates that you wrote down, was that in some sort of calendar that you keep?

A Just a piece of paper.

Q And how did you come up with the dates? Were you looking at any other documents to try to confirm the dates?

A I reviewed the Governor's
past schedule to help remember the dates.

Q Have you spoken to anyone about your testimony today, other than Ms. Joslin?

A No.

MS. CLARK: Emily, if you could share the subpoena.

(The above-referred-to document was marked as Exhibit 1 for identification, as of this date.)

Q Do you recognize this as the subpoena that we served on you before the

1

2

first time that we spoke?

3

A Correct.

4

Q And you understand that

5

you're here today with the continuation

6

of that; correct?

7

A Correct.

8

Q And that obligates that it's

9

all under oath; correct?

10

A Correct.

11

MS. CLARK: Emily, you could

12

take that down.

13

Q Done with the preliminary

14

formal stuff.

15

Did you attend college?

16

A I did.

17

Q What college did you attend?

18

A [REDACTED].

19

Q And did you get a degree

20

from [REDACTED]

21

A I did.

22

Q What was your degree in?

23

A [REDACTED]

24

[REDACTED]

25

Q What year did you get your

1

2

because of technical difficulties.

3

Today has been a breeze so far. I

4

don't want to jinx us.

5

MS. JOSLIN: I'm sorry.

6

Give me one second.

7

A

8

9

10

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12

13

Q

So what year was it that you started at the state police?

15

A

March 2015.

16

Q

And what was the first position you held with the state police?

18

A

Trooper.

19

Q

And where were you posted?

20

A

When I started, I was in the academy for six months in Albany. And then I went on to FTO where I worked in

23

I then worked

24

in And then after

25

I completed my FTO, I went to

1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]. Then I got transferred
3 to Troop NYC.

4 Q So you made reference to
5 FTO.

6 What is that?

7 A Field training.

8 Q And so that, you did in
9 [REDACTED] [REDACTED] [REDACTED]?

10 A Correct.

11 Q What did you do during your
12 field training?

13 A You basically learn the
14 ropes, how to do accident reports,
15 writing tickets for traffic enforcement,
16 domestic violence calls, you name it. We
17 basically have an experienced trooper
18 with us giving us advice and guidance.

19 Q And how long does the FTO
20 last?

21 A It's approximately -- I
22 think it's ten weeks, but I'm not sure.

23 Q And then you were based --
24 were you based in [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] at the same time or [REDACTED]

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first and then [REDACTED] ?

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A

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5

Q

I'm sorry. I'm one of those people that lives in New York City and doesn't know anything above the Bronx.

8

A

That was me before I became a trooper. So I get it.

10

Q

11

How long were you posted in [REDACTED] ?

12

A

For a year.

13

Q

14

What were your responsibilities when you were in

15

[REDACTED] ?

16

A

17

It was the same situation.

18

I worked the road, answered radio calls.

19

You're just alone as opposed to having an FTO there.

20

Q

21

And then you got posted to Troop NYC.

22

How did that come about?

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So they were canvassing for individuals to transfer either to the

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thruway or Troop NYC. I was contacted by

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[REDACTED] [REDACTED]

a supervisor, saying, hey, you're basically being involuntarily transferred to one of these two, where do you prefer to go. Basically, how it works is when a class graduates and then transfers go through, you're most junior. So that's basically how they come out, involuntarily transfers. So I chose Troop NYC just because I worked in the city previously.

Q And how long were you in Troop NYC?

A For a year.

Q And what were your duties when you were in Troop NYC?

A We patrol the bridges and tunnels and the airports as counterterrorism and traffic enforcement.

Q Who did you report to when you were in Troop NYC?

A Who did I report to?

Q Yes.

A Well, I reported to my station, which was on Randall's Island,

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which there are supervisors that I

3

answered to.

4

Q

Was there more than one

5

supervisor at Randall's Island that you

6

reported up to?

7

A

There was a bunch of them.

8

It was a very transient station. When

9

new sergeants got promoted, a lot of them

10

got transferred to Troop NYC until they

11

got more seniority or another class went

12

through, and then movement can happen

13

within a division.

14

Q

And what was your next

15

posting after Troop NYC?

16

A

PSU NYC.

17

Q

And how did it come about

18

that you got moved from Troop NYC to the

19

PSU?

20

A

So it was November 4th,

21

2017. I was working the Henry Hudson

22

post in Manhattan. And I got a phone

23

call from a supervisor, saying, hey, the

24

Governor's coming in, he's doing an event

25

on the RFK Bridge, they want a bunch of

1 [REDACTED] [REDACTED]
2 troopers to be basically the backdrop of
3 his press conference, I need you here at
4 a specific time. That specific time, I
5 don't remember at this time. And I
6 reported to the RFK Bridge. They're
7 replacing people. That's when PSU was
8 there. It's called an advance person.
9 So they basically catch the Governor and
10 bring him where he needs to go at events.

11 Q Let me pause you there.

12 Who was the supervisor who
13 told you that you needed to go to the RFK
14 Bridge to be part of the photo backdrop?

15 A That, I don't recall who the
16 supervisor was.

17 Q Do you recall who the
18 advanced person was?

19 A Investigator [REDACTED]
20 and also [REDACTED] Senior Investigator #1
21 was there as well.

22 Q Continue the story there.

23 A So while I was there, they
24 were talking about where they're placing
25 the podium, where the Governor was going

1 [REDACTED] [REDACTED]
2 to enter and exit. At that time, a PSU
3 member, I believe was Senior Investigator #1 [REDACTED], made the
4 call that we need to have a lead car to
5 basically catch the motorcade while
6 they're coming off the bridge. We would
7 circle down on to Randall's Island and
8 drop them on the Manhattan side of the
9 RFK Bridge. So Senior Investigator #1 [REDACTED]
10 [REDACTED] gets in the vehicle with myself,
11 the supervisor that was on scene from
12 Troop NYC, delegated myself to be in the
13 car with Senior Investigator #1 [REDACTED]
14 because I'm an experienced trooper. I'm
15 pretty squared away. And I also know the
16 city pretty well out of the troopers that
17 were there. So they had confidence in me
18 to be the lead car. Myself and [REDACTED]
19 Senior Investigator #1 [REDACTED], we ran the route
20 on to Randall's, basically looking for a
21 hold spot in case they wanted a pause or
22 prepare before the event. [REDACTED]
23 Senior Investigator #1 [REDACTED], myself, when the
24 time came, we caught the motorcade, the
25 motorcade, which I believe was a charger

1 [REDACTED] [REDACTED]
2 at the time or a suburban. I don't
3 recall. We caught them off the bridge.
4 We led them down to Randall's Island. We
5 held by the baseball field. The Governor
6 exited the vehicle behind me. [REDACTED]

7 Senior Investigator #1 [REDACTED] exited my vehicle.

8 So I thought to myself, I
9 should probably get out of the car. So I
10 got out of the vehicle. I had a
11 conversation with the Governor, small
12 talk, you know, what's your name, how
13 long have you been on the job, where did
14 you work previously. And that was
15 basically it.

16 Q How long was your
17 conversation with the Governor?

18 A I would say maybe
19 approximately two to three minutes.
20 Nothing out of the ordinary, just small
21 talk. I got in the vehicle, [REDACTED]
22 Senior Investigator #1 [REDACTED] got in the vehicle
23 and stated to me, What did you say to
24 him? And I was like, What do you mean?
25 He said, Well, the Governor wants you on

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2 the detail tomorrow, would you come? I
3 said, I don't know what you guys do, what
4 PSU entails, but, sure, I'm interested.

5 And that was basically it.

6 We drove up to the Manhattan side of the
7 RFK Bridge. We continued on. The
8 Governor got out. And that was basically
9 it for me. I maybe talked to Jim for a
10 little bit after. We exchanged
11 information. He said, Reach out to me,
12 you know, if you're interested.

13 So that's what I did. I'm
14 not sure if I -- I'm pretty sure I
15 e-mailed him, saying, Hey, this is me,
16 I'm interested, which I think I gave him
17 my phone number. We spoke on the phone.
18 He basically gave me a little bit more
19 in-depth detail of what PSU entails in
20 dignitary protection for the Governor and
21 other VIPs that visit New York State. He
22 then told me after that I didn't have
23 enough time on. At the time, you needed
24 a three-year minimum to put in for the
25 detail for PSU. I had two and a half

1 [REDACTED] [REDACTED]
2 years short. So this happened in
3 November. I would have hit my three
4 years in March. So he said, Hey, you
5 don't have enough time on. I ran it by
6 the detail commander, who was Vincent J.
7 Straface at the time, and he said, you
8 know, Just reach out to me when you hit
9 your three years, and we'll go from
10 there. So I moved on.

11 A few weeks later, I got a
12 phone call from [REDACTED] Senior Investigator #1
13 [REDACTED], saying, Hey, I need your abstract
14 and your transfer memo, they changed the
15 manual for you. So they put out a File
16 14 canvass for anyone who's interested in
17 PSU. And the minimum was changed from
18 three years to two years.

19 So I believe it was the next
20 day. This change to the manual or
21 notification -- excuse me -- announcement
22 was November 17th, I believe, maybe 16th.
23 We have documentation for that. He
24 responded, saying, Ha-ha, they changed
25 the manual just for you, send me your

1 [REDACTED] [REDACTED]
2 abstract, basically. So that's basically
3 what I did. I put in my transfer for
4 PSU. I had --

5 Q Before we get to the
6 interviews, the conversation you had with
7 [REDACTED] Senior Investigator #1, that was
8 the -- the next day is when he sent the
9 e-mail saying, ha-ha, they changed it
10 just for you?

11 A Well, whenever the
12 announcement came out, he replied to that
13 e-mail I believe that day, saying they
14 changed the manual for you, send me your
15 abstract. Complete is better than
16 perfect.

17 Q And we're going to pause.
18 MS. CLARK: Emily, if you
19 could put that up.

20 (The above-referred-to
21 document was marked as Exhibit 2 for
22 identification, as of this date.)

23 Q So the second page, is that
24 the announcement that went out to all
25 troops?

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A Correct.

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MS. CLARK: Emily, could you go to the first page?

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Q And that was sent on November 17th, and then it looks like the same day, Senior Investigator #1

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10

forwarded it to you, saying, "ha-ha, they changed the minimum from three years to two just for you"?

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A Correct.

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Q And did you -- this change from three years to two, did you ever discuss this with anyone, other than Senior Investigator #1 about how this change was made?

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A It was -- well, after the fact, yeah. It was kind of like known in PSU that, oh, they changed this announcement just for this girl to come here. So it's no secret to a lot of people in state police or PSU.

23

24

MS. CLARK: Emily, you could take that down.

25

Q Did you ever have any

1 [REDACTED] [REDACTED]
2 discussion with anyone in any leadership
3 in the state police about how this change
4 came about?

5 A Not that I recall.

6 Q Did you ever discuss with
7 the Governor this change to the
8 requirement for years of service for PSU?

9 A No.

10 Q And you said it was sort of
11 widely known within the PSU.

12 Did you tell people after
13 you got there or were there other
14 troopers coming up to you and saying,
15 hey, I heard they changed the rules for
16 you, or how did that come about?

17 A Well, people just knew
18 before I got there. So I'm sure [REDACTED]
19 [REDACTED] Senior Investigator #1 had mentioned it
20 to some people. I'm sure I've had a
21 conversation. I don't remember any
22 specific conversation with specific
23 people. But, yeah, there are people who
24 knew. And I'm pretty sure there were
25 people in Troop NYC knew as well.

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Q So he asked you to send
along your materials, and you did so?

4

A Correct.

5

Q And then what happened next
in the process for applying for the PSU?

7

A So I submitted my transfer
memo, requesting to transfer to PSU NYC.
I also submitted an abstract which is
sent with a routing split through the
chain of command within the state police.
So it goes to your sergeant, your station
commander, your zone sergeant and up the
line, all the way up to the major, to the
first deputy.

16

Q What's in the abstract?

17

A Just a basic overall
composition of your history within work,
your evaluation, your training and
credentials, specific cases that you feel
stand out to your work ethic.

22

Q Were there any interviews as
part of the process?

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A Yes.

25

Q Who did you interview with?

1 [REDACTED] [REDACTED]
2 A My interview was March 13th,
3 2017. I interviewed with Sergeant
4 [REDACTED] [REDACTED] Station Commander --
5 Sergeant Station Commander [REDACTED]
6 [REDACTED], Zone Sergeant [REDACTED]
7 [REDACTED], and I believe he was a tech
8 lieutenant at the time, the detail
9 commander, Vincent J. Straface.

10 Q You submitted your
11 material -- the e-mail was dated
12 November 17th.

13 How long after November 17th
14 did you submit your transfer memo in your
15 abstract?

16 A I believe the transfer memo
17 request was the following day, which was
18 November 18th, and through the process of
19 us sending in the abstract because it
20 goes through a chain of command, it kind
21 of takes a little bit, or they want to
22 tweak some errors, or they have some
23 input that you might have forgotten. So
24 that might have been a few days after.

25 Q Did anyone tell you why

1 [REDACTED] [REDACTED]
2 there was any lag in time between you
3 sending in these materials and the
4 interview that took place in March?

5 A Can you repeat that? I'm
6 sorry.

7 Q Sure. Let me ask it a
8 different way.

9 After you sent in your
10 morales, did anyone get back to you and
11 tell you what the next step was?

12 A No. It was just -- they
13 acknowledged that they received it. They
14 were sending it to the lieutenant or
15 captain for approval, I believe in the
16 announcement or it was just known that
17 there was an interview process to get
18 selected. My sergeant station commander
19 at the time was [REDACTED] [REDACTED]. He
20 sent an e-mail, saying your interview is
21 on December 13th, and that was basically
22 it.

23 Q I thought earlier, you said
24 March 13th.

25 A Oh, I'm sorry. I meant

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2 December.

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Q And other than the conversation you had with [REDACTED] Senior Investigator #1 where he told you a little bit more about what the PSU did, did you talk to anyone about what the PSU was like before agreeing to make the move to the PSU?

A I actually spoke to a sergeant in Troop NYC, it's a traffic sergeant, Sergeant [REDACTED]. He used to be on PSU. He actually advised me not to go to PSU. And then I also spoke with First Sergeant [REDACTED]. He was also at the time, a senior investigator with PSU. And they told me not to come here.

Q Did Sergeant [REDACTED] tell you why you shouldn't go to the PSU?

A Sergeant [REDACTED] advised me not to because he said I was ruining my career. And once you leave PSU, you kind of have like a target on your back. And it was better because I didn't have

1 [REDACTED] [REDACTED]
2 that much time on the job to just stay
3 out in the field and get a little bit
4 more experience. And First Sergeant
5 [REDACTED] basically said the same thing.
6 He told me I was never going to get
7 promoted if I came to PSU, and I was --
8 my classmates get promoted before me, and
9 I was ruining my career.

10 And at the time when First
11 Sergeant [REDACTED] advised me not to
12 come, I took it almost because I had a
13 lot of activity when I worked in Troop
14 NYC. And sometimes when you had a lot of
15 high activity, the supervisors don't want
16 to let you go because you make the troop
17 look good. So that's kind of like how I
18 felt at the time. So, yeah, I decided to
19 go for it.

20 Q Did either of them tell you
21 about any negative experiences they had
22 at PSU?

23 A No.

24 Q Did you speak to anyone who
25 recommended that you go to the PSU, other

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than -- did [REDACTED] Senior Investigator #1 [REDACTED]

3

encourage you to go to the PSU?

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A Yeah. I would say so. He was positive about it. I had a few coworkers who bounced the idea of, Hey, what do you think? They said, Go for it. And I also felt like it was an opportunity to try something different as opposed to just working the road for however long. So I just saw it as an opportunity. And it was only a one-year minimum. So if I didn't like it, I would just go back to the road.

15

16

Q So your interviews were December 13th.

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When did you hear whether you were accepted or not?

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A There was a File 14, which is a transfer list, that came out January 8th, 2018. And it was effective January 25th, that myself and two other troopers were transferred to PSU. It was only a PSU transfer.

25

Q Who else was transferred at

1

2 the same time as you?

3 A Trooper [REDACTED]. And
4 I don't recall the other name. But we
5 could provide documentation on that.

6 Q And so it was effective on
7 January 25th?

8 A Correct.

9 Q And on January 25th, where
10 were you posted at that point?

11 A I was working in Troop NYC
12 when the 14 -- File 14 came out.

13 Q So it was effective
14 January 25th at that point.

15 Did you move to the PSU?

16 A Correct.

17 Q And what was your first role
18 within the PSU?

19 A When I went to the PSU, my
20 first post was sitting in the house, the
21 resident's detail. That basically
22 entails perimeter security of the

23 Governor's home which was [REDACTED]

24 [REDACTED] in Mount Kisco. We sat in a Tahoe
25 by ourselves, basically looking for any

1

2 suspicious activity. If there were
3 packages that were delivered, we would
4 scan them to make sure that they were
5 safe and document guests that came in and
6 out of the residence.

7 Q And on the shift, were you
8 alone or did you work with other
9 troopers?

10 A Yup. So I was by myself in
11 Tahoe in front of the residence. When we
12 had a heightened security, we would also
13 add an additional post, which was in the
14 church parking lot, which was bordering
15 the Governor's residence.

16 Q How long were you posted to
17 Mount Kisco?

18 A I worked the house from
19 January -- well, from when I got there,
20 January 25th, 2018. And then I moved to
21 the travel team sometime in April of
22 2019.

23 Q And when you joined the PSU,
24 did you get any training, particular to
25 working on the PSU?

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[REDACTED] [REDACTED]

A When I got to PSU, they held like a little orientation, I guess you would say, of like a PowerPoint. And there's a book of our procedures that we should know of our duties. So they did hold a little orientation. And I also received training with NYPD dignitary protection school at their academy.

Q How long did that training last?

A I believe it was three days.

Q And what were the things that were sort of different about working on the PSU than from other posts that you had with the state police?

A It was very different. So I'm working the road and interacting with the public and enforcing the law, I guess you could say. This was more of like revolving around the individual. It's a different type of security. It's not -- it's police work. But it's not the typical police work that you would see on TV or the regular person would know

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2

about.

3

Q

4

Did you receive any training about sexual harassment when you joined the PSU or at any time after joining the PSU?

6

7

A

For New York State, we have to complete the New York State sexual harassment course. I believe that's once every year. And I've done that since I've gotten on the job.

10

11

12

Q

13

And have you done that through a video or some other means?

14

A

15

It's online SLMS training. So you log in, and you complete it.

16

Q

17

Did the training cover how one can report sexual harassment?

18

A

Yes.

19

Q

20

And for someone who works with state police, what's the procedure for reporting sexual harassment?

21

22

A

23

I would go to my direct supervisor and notify them.

24

Q

25

And when you joined the PSU and you were being told about all the

1 [REDACTED] [REDACTED]
2 responsibilities and requirements, were
3 you told anything about confidentiality?

4 A Yes. We are to sign a
5 confidentiality agreement, basically not
6 to speak about anything that goes on
7 there with anybody outside the detail,
8 including family members or friends.

9 Q When you were stationed at
10 Mount Kisco, to whom did you report?

11 A I reported to Sergeant
12 [REDACTED] [REDACTED] and Sergeant/Station
13 Commander [REDACTED] [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED]

15 Q Were there other troopers
16 that you interacted with when you were
17 stationed at Mount Kisco, people that
18 worked on other shifts or people that
19 might be stationed in the church parking
20 lot or others that you've sort of dealt
21 with on a day-to-day basis?

22 A Yes. So it's face-to-face,
23 really. You cannot leave your post until
24 someone relieves you.

25 Q And so who were the other

1 [REDACTED] [REDACTED]
2 troopers that you were dealing with when
3 you were at Mount Kisco?

4 A Members that were on my
5 platoon would be [REDACTED]
6 [REDACTED]
7 [REDACTED]. [REDACTED]
8 transferred out. [REDACTED]
9 [REDACTED]
10 [REDACTED]. And that's all I could
11 recall at this moment.

12 Q When you were stationed at
13 Mount Kisco, how often would you interact
14 with the Governor?

15 A It wasn't that often. He
16 was kind of in transition from being at
17 [REDACTED] in Mount Kisco and going back
18 and forth to the executive mansion in
19 Albany. I did have few interactions with
20 him, whether he was pulling in, you know,
21 just coming home, or there were a few
22 times when he wanted to go down to the
23 office early, he would jump in the Tahoe,
24 and you're expected to drive him down to
25 633 3rd Avenue.

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██████████ ██████████
Q During the time that you
were stationed at Mount Kisco, did you
ever see any employees from the executive
chamber come to the house?

A Yes.

Q And which executive chamber
employees visited the Governor in Mount
Kisco?

A The only one I could recall
at this time would be Annabel Walsh
because we have to log who shows up. And
I remember asking her, her name. And she
had an attitude when I asked her what's
her name, like she expected me to just
know who she was. But granted, I was
new, and I don't interact with the
executive chamber at all. And I believe
there was a male there. They were
shooting a campaign for the upcoming
election. So a video or something.

Q Did you ever observe, when
you were stationed in Mount Kisco, any
executive chamber employees spending the
night in Mount Kisco?

1

2

A No.

3

4

Q Now, I believe you said it was April of 2019 that you left the post in Mount Kisco?

6

A Correct.

7

8

Q And what was the next role that you had?

9

10

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15

A So I was assigned to the travel team. And that entails, you are the motorcade for the Governor. You could either be the driver, the tail driver, advancing events, perimeter security or undercover intel for pop-up protests.

16

17

18

Q And how did it come about that you moved from Mount Kisco to the travel team?

19

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A I would say I put the time in and the work. There were times where we would be assigned to assist the travel team. And it's almost like a tryout. So you had to prove that you were capable of functioning and performing under high-pressure situations and also the

1

2 type of personality that the Governor
3 has.

4 Q When you say "the type of
5 personality that the Governor has," what
6 do you mean by that?

7 A So he's very demanding. And
8 when he expects something to be done, it
9 needs to get done. And there can't be
10 any little hiccups, if you will. So
11 everything needs to go smooth without
12 upsetting him, per se.

13 Q And why did you want to move
14 from being the house trooper to on the
15 travel team?

16 A I wanted something
17 different. I wanted to be active. Just
18 sitting at the house doing perimeter
19 security was not really what I thought I
20 was signing up for; you know, I was out
21 on the road interacting with the public,
22 whether it was writing tickets or
23 assisting in accidents.

24 So I enjoy that high pace.
25 And when I went to the house, it's kind

1 [REDACTED] [REDACTED]
2 of like, okay, now what, you know. So
3 the travel team was the next move for me
4 personally, I felt.

5 Q And did you speak to anyone
6 either on the travel team or higher up in
7 the chain of command about your interest
8 in switching to the travel team?

9 A Yup. So I would say I
10 expressed interest to my sergeant,
11 [REDACTED] [REDACTED], at the time and Station
12 Commander [REDACTED] [REDACTED] that I was
13 interested in going to the travel team.
14 I'm sure there were times where the
15 detail commander, Vincent J. Straface,
16 would -- you know, How's it going, do you
17 want to go on the travel team? -- try to
18 pick your brain of what your aspirations
19 were for PSU.

20 Q And when you moved to the
21 travel team, to whom did you report to?

22 A [REDACTED] Senior Investigator #2
23 [REDACTED].

24 Q Why don't you spell that
25 last name for the court reporter.

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[REDACTED] [REDACTED]
A I don't know how to spell
it.

Q And were you based in --
were there two travel teams? One in New
York City and one in Albany?

A That's correct. So I would
report to Chappaqua which was our
station. We also had a city office as
well with the motorcade. And for the
most part, the travel team would report
to Chappaqua.

Q When you switched from Mount
Kisco to the travel team, did you receive
any additional training of any kind,
orientation in terms of what the
difference would be in responsibilities?

A Yes. So within that
orientation, they go through your role,
whether you're at the house and what the
travel team requires. Again, when I was
on the house assisting the travel team,
you kind of get a feel for -- and you
would get guidance from members on the
travel team of what's expected and, you

1

2 know, just little pointers.

3

4 Q And do you recall any
5 pointers you got from members of the
6 travel team about how to keep the
7 Governor happy?

8

9 A Yeah. Let me just try to
10 think. It was basically -- always have
11 an answer, don't tell him no and whatever
12 he wants, make it happen and just in
13 general, expectations for us as things
14 needed to be smooth. So when he arrives
15 at the city office, the elevator needs to
16 be there. If he gets there and the
17 elevator's not there, that's a problem
18 from a security standpoint and also
19 dealing with him, feeling the wrath of
20 that.

21

22 Q And do you recall who gave
23 you the pointers of how to make things
24 run smoothly or what to do to keep the
25 Governor happy?

26

27 A I would just say everybody.

28

29 So at the time, it was [REDACTED]

30

[REDACTED] Senior Investigator #2

and

1 [REDACTED] [REDACTED]
2 Investigator [REDACTED], Investigator
3 [REDACTED], [REDACTED], just sort
4 of little things that maybe they messed
5 up on, said, Hey, don't do this or try to
6 do this, you know, don't depend on
7 somebody to get the elevator, open the
8 gate for you, make sure you have a card
9 or a contact number or who to contact at
10 Port Authority when you're using
11 LaGuardia or JFK for an escort, just
12 little things like that.

13 Q And you described some of
14 the various roles that people do on the
15 travel team.

16 When you joined the travel
17 team, were you assigned any particular
18 role or did you cover all sorts of roles?

19 A I would say a whole bunch.
20 But when I first got there, I would say I
21 was probably tailing a good amount of
22 time and maybe advancing 633 which was
23 his office. I've done that before. So
24 that was in April. I would say in June,
25 I made the transition to driver because

1 [REDACTED] [REDACTED]
2 Investigator [REDACTED] had retired. When
3 it comes to drivers, the Governor is
4 extremely particular about who drives him
5 because there's an expectation when you
6 drive him. He's a car guy. He doesn't
7 want anyone passing him, yeah.

8 Q We'll come to the driving in
9 a minute.

10 A Okay.

11 Q When you're tailing, what do
12 you do when you're tailing?

13 A So when you're tailing, you
14 basically -- the Governor doesn't want
15 passengers, whether it's his staff in the
16 car with him, they'll jump in the car
17 with you. You make communication with
18 the advance person and notifications
19 about, you know, Hey, we're two minutes
20 out, we're a block out, we're coming at
21 you, things like that.

22 Q And when you are catching
23 the Governor at 633, what does that
24 involve?

25 A So you're coordinating with

1 [REDACTED] [REDACTED]
2 your team. So there's a person who
3 catches the Governor which means that the
4 Governor is following them. And also
5 when you're advancing, there's perimeter
6 security holding up traffic because you
7 go counterflow on the tunnel exit in
8 Manhattan. And they go counterflow down
9 40th Street and load it to the loading
10 dock. The elevators, just making sure
11 your keycard works to get him upstairs to
12 the 39th floor where his office is
13 located.

14 Q And who was it who asked you
15 to switch to being the driver?

16 A That would be [REDACTED]
17 [REDACTED] Senior Investigator #2.

18 Q And before you became the
19 driver for the Governor, did anyone --
20 you said the Governor's very particular.

21 Did you get any pointers
22 from people as to what to do or not to do
23 when driving for the Governor?

24 A Yeah. It's kind of like a
25 known. So when we do the orientation,

1 [REDACTED] [REDACTED]
2 they kind of give us a rundown of how you
3 should be driving and also to -- it's
4 also to take evasive action in case
5 there's a threat. You never really want
6 to be stopped at a red light. You're
7 kind of like a sitting duck. So there's
8 different tactics and skills that we
9 learn. We also did like a course of
10 EVOC, just certain things to protect the
11 Governor.

12 Q A course of what?

13 A It's called EVOC. It's a
14 course basically where you -- we go up to
15 Oriskany and do like serpentine and
16 different speeds. All emergency
17 personnel basically take it, basically
18 hitting the brakes, swerving, driving
19 skills. But when you drive the Governor,
20 it's kind of like you're bobbing and
21 weaving through cars because you don't
22 want anyone passing you. And he wants to
23 get where he wants to go very quickly.

24 Q Did the Governor direct
25 people driving him to drive above the

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2 speed limit?

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[REDACTED] [REDACTED]

He never said it. But you know what's expected of you. So it's kind of like an unwritten rule. And he will never say that he told you to drive that fast. And I'm sure if something happened, he would say his eyes were closed. So it's no matter what, whether you're driving the Governor or if you're responding to a domestic call, it's always going to be on the driver. Doesn't matter if he told you to. You're driving the vehicle. So if something happens, it's on you.

Q And what was the practice for sort of how fast, whoever was driving the Governor would be driving him within New York City?

A Can you repeat that? I'm sorry.

Q I thought you said it was sort of an unspoken rule.

When people were driving the Governor in New York City, traffic

permitting, how fast were you driving?

A I mean if there's an open road, I would say maybe like 70, maybe 80, let's say, on the FDR. But when it came to driving, especially leaving the Mount Kisco house getting to the city, there were times when you would use your lights to push people, you know, to the right lane. So you have a clear path to get to where you want to go.

And I think for a lot of us, especially someone like me when I was tailing, I basically went off of what the person driving was doing because that's the expectation. And as the tail car, you have to keep up with the limo, is what we call it, the suburban, a charger, whatever vehicle the Governor's in. So you're expected to keep up. And if they're taking holes or riding the shoulder, you're right there behind them. So when you become a driver, you're expected to drive like that.

Q And how long were you -- let

1 [REDACTED] [REDACTED]
2 me back up.

3 When you were a driver for
4 the Governor, you're in the car in the
5 driver's seat. Where does the Governor
6 sit?

7 A So when you're in the
8 driver's seat, the Governor is next to
9 you in the front passenger seat. And the
10 senior investigator is behind the driver.

11 Q And during the time that you
12 were driving for the Governor, who was
13 the senior investigator?

14 A [REDACTED] Senior Investigator #2
15 [REDACTED]. And there were also times
16 where the detail commander, Vincent J.
17 Straface, would also be -- it's called
18 the body. Let's say [REDACTED] Senior Investigator #2
19 [REDACTED] was advancing an
20 event or if, let's say, Vincent J.
21 Straface was flying with the Governor, he
22 would be the body getting in the car. So
23 there would never really be two
24 supervisors in the car. It was either
25 one or the other or whoever was covering

1

2 that day.

3 Q Were there ever any other
4 passengers in the car, other than you,
5 the Governor and a senior person?

6 A Maybe one of his staff
7 members, Melissa DeRosa, Stephanie
8 Benton, has been in the car with him
9 before.

10 Q And the Governor sitting in
11 the front passenger's seat from the
12 training you received about providing
13 effective services, was that the norm?

14 A No. He should be in the
15 backseat. But the Governor wants to sit
16 where he wants to seat. And there's no
17 telling him different.

18 Q How long were you a driver
19 for the Governor?

20 A I would say from end of June
21 2019 to early mid September of 2019.

22 Q And did you do driving for
23 him up in Albany or did you stay in New
24 York City and different people would
25 drive for him if he went up to Albany?

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[REDACTED] [REDACTED]

A The first time I actually ever drove was in Albany. It was from the executive mansion to Albany Airport. And, again, being the driver is like a high-stress situation because he is particular. And you need to basically have the routes memorized in the car. There's no radio on. Your GPS is off. And there's silence in the car unless he speaks to you. It's again an unwritten rule. And PSU is, you only speak when you're spoken to. So the first time I drove was in Albany. And then from there, I've driven out in Long Island, Lower Hudson Valley and NYC.

Q And why did you stop being a driver for the Governor?

A So there was one time that I stopped short, getting off the FDR, which I wasn't a fan of, and I had a conversation with my senior -- there was one day, there was a Farmingdale event in September. And Vinny -- can I use first names? Is that okay?

1

2

Q Sure. That's fine.

3

A Okay. So Vinny and SI#2

4

had a conversation with the Governor. So

5

at the Farmingdale event, SI#2 was the

6

driver. And Vinny was the body. They

7

had a conversation. The Governor said,

8

Hey, you know I had too many close calls

9

with her driving, you know, I want

10

someone with a little bit more experience

11

because traditionally, the driver is a

12

senior position but someone with more

13

experience in the sense of senior

14

position.

15

So that was basically it. I

16

had a conversation with SI#2. He

17

said, hey -- he said he had too many

18

close calls, you're still allowed to

19

drive, but you're not going to be the

20

primary driver. So we have a Number One

21

driver and a Number Two. So if it's a

22

two motorcade day, like I was allowed to

23

drive.

24

Q I'm sorry. There's massive

25

sirens. I just muted myself.

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3

Who replaced you as the
Number One driver?

4

A Investigator [REDACTED].

5

Q Did [REDACTED] ever tell you

6

what he was told as to why he was

7

becoming the Number One driver?

8

A I never had a conversation

9

of why. But to me, the writing was on

10

the wall. So at the end of August that

11

year, there was a fire a few blocks from

12

the Governor's mansion. There was some

13

transfers that took place. I believe at

14

that time, [REDACTED], who was on the

15

Lieutenant Governor detail, had gotten

16

switched over to our detail with the

17

Governor.

18

So, again, I don't have that

19

much experience. Majority of the people

20

who were on my team were not allowed to

21

drive or just did not want to drive. So

22

they brought [REDACTED] over. [REDACTED] has been

23

with multiple governors before, has

24

driven them. So he's more qualified and

25

experienced than I am. So I totally

1 [REDACTED] [REDACTED]
2 understand that. So to me without him
3 even saying, I said this is going to be
4 Vinny's plan. I totally understand why
5 they would want [REDACTED] to drive.

6 Q Did anyone ever tell you
7 that Vinny wanted you removed as a driver
8 because of any inappropriate comments the
9 Governor had made to you?

10 A I had heard a rumor that
11 Vinny made that comment to [REDACTED]. I never
12 asked [REDACTED] about it. I never asked Vinny
13 about it. But there was a time when to
14 me, the Governor made kind of an
15 inappropriate comment, or questions were
16 made when Vinny was in the car. So you
17 could speculate why I think it was
18 experienced. And I also think that Vinny
19 was either trying to protect me or he was
20 most likely trying to protect the
21 Governor.

22 Q What was the comment that
23 Vinny was present for that the Governor
24 made?

25 A So there was an event --

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after he went wheels up to fly to -- I believe it was Camp David, there was an event in Peekskill. So it was a two motorcade day. I remember driving over the Whitestone or the Throgs Neck Bridge. And I get a pin from Vinny, saying "stays in truck."

And I didn't know what that meant at first. I was looking around the vehicle. I'm like, Did they leave something? And then he sent another pin, being like -- I don't remember exactly what it said. But it was basically like keep it between us or stays in truck, don't repeat. And that's when I was like, oh, okay. And I remember thinking, oh, no, I must have messed up because when we got to the Baldwin event, I remember using the restroom, [REDACTED] used the restroom, and I was like, Oh, my God, can you believe the Governor asked me why I don't wear a dress? And I remember bits and pieces. Vinny and the Governor were having a conversation about movement

1 [REDACTED] [REDACTED]
2 in PSU, about maybe bringing in seniors
3 or promoting someone to senior. So I
4 told [REDACTED] that too. And once I got that
5 pin of, you know, stays in truck, don't
6 repeat, I was like, Oh.

7 So that was kind of like --
8 you know, silenced me. And it's also
9 kind of like a known thing, whatever
10 conversation takes place in the truck,
11 you don't repeat it because you're
12 supposed to have like a trust and like a
13 bond; you know, sometimes the Governor
14 has personal conversations, or there's
15 things that you just shouldn't repeat.
16 Sorry.

17 Q And the pins, that's sort of
18 the BlackBerry version text message?

19 A Yeah. So it's basically
20 encrypted. Each cell phone has a pin
21 number. It's composed of letters and
22 numbers. And it's specific for that
23 phone. And everyone just speculates they
24 don't want a paper trail. That's why
25 they choose pins as opposed to text

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2

messages. And for pins, most

3

communications is for the movement of the

4

Governor, just little things like that.

5

Q And when you say "they," was

6

it just the PSU that used pins or was it

7

used in other parts of the state police?

8

A State policewise, to my

9

knowledge, it's just PSU. I do know that

10

the Governor and us communicate with

11

executive chamber via pin as well.

12

Q And do you recall anyone

13

telling you what the reason was, that it

14

doesn't create a paper trail?

15

A I don't remember anyone

16

specifically. It was kind of just like a

17

known thing.

18

Q And the pins, if you didn't

19

affirmatively delete a pin, did it

20

disappear after a certain period of time?

21

A I'm not a tech guy. But I

22

would assume so.

23

Q Do you still have the

24

BlackBerry that you used back in 2019?

25

A No. They made us turn it in

1

2 when we switched over to the iPhones.

3 Q And when did you switch over
4 to the iPhone?5 A I would probably say maybe
6 that like October of 2019. The whole
7 thing was we all want to be on the same
8 type of communication. So when some of
9 the executive chamber were transferring
10 over to iPhones, we started too. But
11 only supervisors had the BlackBerry. I
12 remember Stephanie Benton being in the
13 car with me, being like, Oh, we almost
14 got him -- referring to the Governor --
15 to switch over to the iPhone. But he
16 doesn't want to give up the BlackBerry.
17 Then they were saying it was kind of
18 becoming obsolete because it's 3G, and
19 technology is changing.20 So the Governor at the
21 time -- or I don't know if he still
22 does -- but he, you know, didn't switch
23 over to the iPhone. All of our
24 supervisors still had the BlackBerry.
25 Eventually, they gave the supervisors

1

2 iPhones. But they still had BlackBerry
3 to communicate with whoever else had
4 BlackBerries.

5 Q Who were the people who kept
6 the BlackBerries after the switch to the
7 iPhone within the state police?

8 A Senior investigators. I'm
9 not sure if sergeants -- those are
10 supervisors. So I'm pretty sure they
11 were as well, tech lieutenants, the
12 captain. And that's all I could think
13 of.

14 Q When the switch to the
15 iPhone happened, did you use a text
16 function of the iPhone? What replaced
17 the pins?

18 A So it was basically just a
19 text group. And I think allegedly, those
20 were supposed to be encrypted. That's
21 why we were allowed to switch over to the
22 iPhone. It's just basically a group chat
23 of everyone for the movements.

24 Q And do you know if there's
25 any setting that auto deletes the texts

1

2 after any period of time?

3

4 A With the iPhone, not to my
5 knowledge. I'm pretty sure if you don't
6 delete the group, the message is still
7 there.

7

8 Q And do you still have text
9 messages going back to when the
10 switchover happened?

10

11 A Yeah. I haven't deleted the
12 group since we got it. I think if you
13 try to scroll up, I think it does stop
14 you at one point. But I'm sure with
15 technology these days, you could probably
16 get it off the phone.

16

17 Q Did you ever hear about the
18 Governor complaining about anyone else's
19 driving, any other incidents?

19

20 A I heard that -- I haven't
21 heard the Governor specifically say, Hey,
22 this person's not allowed to drive me.
23 But it was kind of known that [REDACTED]

23

24 [REDACTED], he
25 wasn't allowed to drive because he
stopped short on the Bronx River Parkway.

1 [REDACTED] [REDACTED]
2 [REDACTED], he wasn't allowed to
3 drive at the time because he might have
4 stopped short for a cyclist when he was
5 making a left turn to East 34th helipad.
6 The Governor allegedly complained to
7 Vinny. Trooper [REDACTED], it was
8 known that he was basically left on the
9 side of the road. I don't know what
10 transpired in the car. He wasn't allowed
11 to drive. He was left on the side of the
12 road. Investigator [REDACTED], he had
13 driven the Governor. And I don't think
14 he could take the high stress and just
15 didn't even want to put himself in the
16 situation. So he said, I'm not driving
17 him. And [REDACTED], she never drove.
18 She was very good at advance work. So
19 they kind of just left her. That was
20 like her niche.

21 Q And [REDACTED], do you
22 know where he was left on the side of the
23 road?

24 A I don't remember what
25 parkway or highway. I wasn't working. I

1

2 heard about it after the fact.

3 Q But it was a highway or
4 parkway; it wasn't somewhere in Midtown
5 Manhattan?

6 A No. It wasn't like a
7 residential, like suburban street. It
8 was a busy 55-mile-per-hour highway or
9 parkway.

10 Q And where did you hear about
11 that incident from?

12 A I do know [REDACTED] mentioned it
13 to me. Again, I don't remember the
14 details. I think even later that day, I
15 was like the talk of the town, if you
16 will, like, Hey, can you believe it? And
17 we've also heard stories. On the other
18 platoon, it was Investigator [REDACTED]
19 [REDACTED]. He stopped short in a crosswalk
20 to let pedestrians walk by. And the
21 Governor got upset because, you know,
22 people could look in the cars. And after
23 that, he wasn't allowed to drive. It was
24 just like little things here and there
25 that upset him, you know, I don't want

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2 them driving me.

3 Q Did you ever observe or hear
4 the Governor yell at anyone?

5 A There was a time when I was
6 driving in Jones Beach, we were heading
7 to an event in Brooklyn. And I don't
8 know who the Governor was on the phone
9 with. But he was upset that we were
10 driving from Jones Beach to the Brooklyn
11 event instead of flying in the
12 helicopter. So he was yelling, It's my
13 life, if I want to fly, I can fly, who
14 made the call to drive and not fly?
15 Vinny was in the car while this
16 conversation was taking place.

17 Q Any other times that you
18 heard the Governor yell at anyone?

19 A Not to my recollection at
20 this time, no.

21 Q Do you recall any incidents
22 where the Governor was sort of going down
23 a line of PSU members and yelling at them
24 but then didn't yell at you?

25 A No.

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Q Has the Governor ever yelled
at you?

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A No.

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Q When you were removed as
driver, what role were you put in?

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A I was just put as the tail
driver. And I also advanced. For the
most part, the tail driver is like the
Number Two driver, just in case, let's
say there's an accident or he needs to
get in your car, you need to be
dependable to drive him. So I did
advancing and also tail driving.

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Q And are those your current
responsibilities or has your role changed
again?

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A So now I'm still a tail
driver advance. As someone on the travel
team, I will assist with security for his
daughters.

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Q And you assist with security
for his daughters when they're in the
city or do you go up to Albany for that
or something else?

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[REDACTED] [REDACTED]

A A bunch of things. So if they want to leave their apartment in the city and want a ride to JFK or Newark, they want to go from the city to Albany or vice versa, there had been times where I've picked them up in Hyannis Port, Massachusetts, driven them to the executive mansion or the mansion to Hyannis Port, Massachusetts.

Q Is it typically a female trooper who provides coverage for his daughters?

A So back in May 2020, there was a little incident where [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

And after that happened, which was completely unprofessional, I'm pretty sure -- I don't know if it was division's call or the Governor's or Melissa DeRosa's, but it was known that now from this point on, females will be driving the daughters. And let's say

1 [REDACTED] [REDACTED]
2 it's a long trip, like to Hyannis Port,
3 I'd be accompanied with a male trooper,
4 investigator, just because it's a long
5 drive. So you kind of like break it up.
6 But it's kind of like, if a male's
7 driving, female needs to be in the car.

8 Q Are you -- do you still have
9 the title of trooper?

10 A No. I'm currently an
11 investigator.

12 Q Congratulations.
13 When did you become an
14 investigator?

15 A [REDACTED].

16 Q And is there an average
17 period of time that someone is a trooper
18 before they become an investigator?

19 A So for our job, you need to
20 have a minimum of two years and a
21 bachelor's degree. And if you don't have
22 a bachelor's degree, it's a four-year
23 minimum as the rank of trooper.

24 Q To get promoted from trooper
25 to investigator, is that something you

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1 [REDACTED] [REDACTED]
2 apply for, do your supervisors just
3 determine that you're ready or how does
4 that work?

5 A A little bit of both. I
6 mean if you're interested, you put in.
7 Sometimes like you made a supervisor's
8 blessing, if you will, or they just
9 recommend you. I know when I put in at
10 the time, I was driving the Governor, and
11 there was a canvass that put out for
12 investigators to come to PSU.

13 Now, normally, you promote
14 with in-house, they call it. So if
15 you've done your time on the detail, you
16 should get promoted. But there was a
17 canvass basically asking outside
18 investigators to put in for PSU. So when
19 that came out, I remember I was at Hudson
20 Yards, Vinny was there, [REDACTED] was
21 there. And we were talking about the
22 canvass. A lot of people were upset,
23 including myself. But Vinny was like,
24 Oh, you know, you should put in for an
25 investigator, you know, you've been

1 [REDACTED] [REDACTED]
2 driving, you've done a great job, just
3 make sure you don't tell [REDACTED]
4 [REDACTED] Senior Investigator #2 [REDACTED] that
5 you're putting in, like we never had this
6 conversation. So I was like okay. So,
7 of course, I told SI #2.

8 Q Do you have any idea why
9 Vinny told you not to tell SI #2 about it?

10 A I don't know. It just
11 didn't sit right with me. He was my
12 direct supervisor. SI #2 would have told
13 me to put it in any way. He was even
14 upset that they put that canvass out.

15 But also, too, there was
16 another trooper with me, [REDACTED]
17 [REDACTED]. And I didn't want to put in
18 for something and him like not have the
19 opportunity as well. We were both doing
20 the same job. There's no reason why I
21 should have an opportunity and [REDACTED]
22 shouldn't.

23 So I wanted to make sure I
24 expressed that to SI #2. I expressed it to
25 [REDACTED] as well. And SI #2 said, Yeah, I

1 [REDACTED] [REDACTED]
2 was going to tell both of you guys to put
3 in, like it's not fair that they're
4 canvassing investigators outside this
5 detail when you guys have put in the
6 work. So, yeah, after that, I submitted
7 my memo and abstract to become an
8 investigator.

9 Q And is there an interview
10 process or do you just put in your
11 paperwork and the people above you decide
12 whether you deserve it or not or how does
13 it work?

14 A By the book, you do an
15 interview process. You submit your memo
16 and your abstract through the chain of
17 command. And I did my interview with
18 Tech Lieutenant [REDACTED] and Senior
19 Investigator [REDACTED], did the interview,
20 and then a File 14 -- excuse me. A
21 promotion list came out I think a few
22 months after. But within PSU, it's kind
23 of known that the Governor gives the seal
24 of approval who gets promoted and who
25 doesn't within PSU.

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Q Did anyone else get promoted to investigator at the same time as you within the PSU?

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A Yes. So I got promoted, [REDACTED]. And I believe at the time, [REDACTED] Senior Investigator #2

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was transferring out to Troop NYC, and

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[REDACTED] got promoted to senior investigator I believe on that transfer list or promotion list.

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Q Did you ever have any discussions with the Governor about getting promoted?

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A No. I never had a specific conversation. There was a time when I was driving, I remember it was on the FDR, he said something that he thought was funny and goes -- and I didn't

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respond. And he's like, Ha-ha, isn't that funny, Trooper? Excuse me, Ha-ha, isn't that funny, Investigator? And I corrected him. I said, I'm not an investigator, I'm a trooper.

24

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And that was it. I don't

1 [REDACTED] [REDACTED]
2 know if that somehow got back to
3 somebody, being like, Hey, promote her.
4 I don't know what transpired. You'd
5 probably have to ask Vinny about that.

6 Q The time where the Governor
7 called you investigator, was that before
8 the time that Vinny had the conversation
9 with you, saying you should put in for
10 it?

11 A I don't remember the
12 specific timeline.

13 Q Who's your supervisor
14 currently?

15 A Senior Investigator [REDACTED]
16 [REDACTED].

17 MS. CLARK: Why don't we
18 take like a ten-minute break. We'll
19 come back at like 2:25.

20 THE VIDEOGRAPHER: The time
21 is now 2:15 p.m. And we are off the
22 record.

23 (A short recess was taken.).

24 THE VIDEOGRAPHER: The time
25 is now 2:30 p.m. And we are on the

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record.

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Q If you could just describe for us how the Governor acted when he interacted with you.

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A He was very positive, nice, flirtatious, joking around a lot, playful.

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Q Did you observe how he interacted with male troopers?

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A Yes. Not as flirtatious. He would be friendly and not give them the time of day, maybe acknowledge them some days, maybe not others.

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Q When you say "flirtatious," can you describe any -- all the incidents you can recall where you thought the Governor was being flirtatious?

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A Yeah. He tried to be flirtatious. A lot of times, it came off creepy. So I would say -- let's go back. So one of the first moments that kind of like made me feel uncomfortable or creeped out where he was trying to be flirtatious, I was sitting at the house.

1

2 He was walking around his yard. He has a
3 pond there he would clean up. So when
4 the Governor's outside, you get out of
5 the truck. So you're standing out there,
6 he would come over to me, Hey, how's it
7 going? Just small talk. Any plans for
8 this weekend? And I said, Yeah, my
9 sister's wedding. Actually, it's in
10 Albany. And he was like, Oh, have you
11 ever been to the mansion? I said no.
12 And he said, Oh, you know, I could give
13 you a tour, unless it's against any
14 protocols, and like snickered and walked
15 off. And I was like -- so, to me,
16 granted, they do tours at the executive
17 mansion. But you knew exactly what he
18 was saying.

19 Q What did you understand he
20 was saying?

21 A That he wanted to personally
22 walk me around to the mansion inside.
23 And that made me uncomfortable because
24 what are you alluding to or insinuating?
25 So it was kind of like up to your

1 [REDACTED] [REDACTED]
2 interpretation. But you knew clearly
3 what he was trying to convey in his
4 message.

5 Q When did this occur?

6 A So my sister got married in
7 September of 2018. The exact date, I
8 don't recall. But it was prior to that.
9 [REDACTED], she got married.

10 Q Did you tell anyone else in
11 and around that time period about the
12 Governor's comment about giving you that
13 tour of the mansion?

14 A Yeah. I confronted a few
15 people at the time, maybe one of my
16 friends that may be worked in the city.
17 She's a trooper. And I wasn't really too
18 close with anyone. So at the time, I
19 didn't tell them that. I think after the
20 fact when I got on the travel team and
21 got like closer with some of my
22 coworkers, I ended up telling them at
23 some point. But in that exact moment, I
24 kind of like kept it to myself and was
25 like woah.

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[REDACTED] [REDACTED]
Q Who was the friend who was
the trooper who you told at the time?

A Trooper [REDACTED]
She's stationed in Troop NYC.

Q Who were the coworkers that
you told later?

A I'm pretty sure I told [REDACTED]
[REDACTED] and Investigator [REDACTED]
[REDACTED] and Investigator [REDACTED].

Q Were there any other times
when the Governor offered to give you a
tour of the mansion?

A That's all I can remember.
It was brought to my attention later on,
which I didn't really recall too well
because, again, he was always trying to
be playful. And I kind of just like
brushed it off because to me, like I'm a
trooper. I could handle anything that's
put in front of me, whether it's a
high-stress situation.

So when he made these
comments, it was like off-putting, and I
kind of rolled them off. But there was a

1 [REDACTED] [REDACTED]
2 time when I was working in Albany that
3 the Governor invited me upstairs. Again,
4 I don't recall this. Someone brought it
5 to my recollection, like you don't
6 remember that time. I'm like -- again,
7 because it happened so frequent and it
8 was like normalized that it wasn't even,
9 you know, a train of thought or, you
10 know.

11 Q When you say he invited you
12 upstairs, upstairs in the mansion?

13 A Yeah. And I was in Albany.
14 I think he had come back from Mount Kisco
15 up to Albany. I saw him in the parking
16 lot, the motorcade was exiting, walking
17 into the command center. And he invited
18 me, Oh, why don't you come upstairs. And
19 obviously, I politely declined. Again, I
20 don't recall that incident too well. But
21 another investigator, [REDACTED],
22 mentioned it to me, you know, when all
23 the stuff started coming out.

24 Q Is upstairs where the
25 Governor's sleeping quarters are?

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[REDACTED] [REDACTED]

A Well, within the parking lot, there's two different like levels where the station -- excuse me -- the command center is. And there's kind of like an upper level where the Governor's mansion is. So, again, you could say upstairs and just come inside and have lunch or just look around or does that mean come upstairs to my bedroom, which his room is on the second floor. I don't know. Again, up to your interpretation.

Q And when did [REDACTED] [REDACTED] remind you of this event?

A I would say like a few months ago. I don't remember the exact date. But we were just, you know, talking about everything that was going on before obviously I got involved in this. We were just saying how, you know, he has a habit of being creepy or flirtatious, you know. So [REDACTED] brought that up. And, again, I didn't recall.

Q Did [REDACTED] remind you of

1 [REDACTED] [REDACTED]
2 any other incidents in that conversation?

3 A No.

4 Q Have you ever been inside
5 the mansion?

6 A I have in December of 2019
7 when I was fairly new to PSU. I became
8 close with Investigator [REDACTED].
9 She encouraged me. They have -- every
10 December, they have like a Christmas
11 party for executive chamber and PSU
12 members, just for comradery and support.
13 [REDACTED] suggested that I go to the holiday
14 party with her, just because it's a good
15 look, you know, you want to get on the
16 travel team. It shows morale. It's
17 politics.

18 So I went to the PSU holiday
19 party with her where you're basically on
20 the first level of the mansion. There's
21 the kitchen, there's, you know, a little
22 dining area, a living area. They have an
23 area where there's a Christmas tree. I
24 also worked at a few other receptions
25 that the Governor has held there. So

1 [REDACTED] [REDACTED]
2 that's the only few times that I've been
3 inside the mansion.

4 Q Have you ever been in the
5 mansion when it wasn't some event with
6 lots of other people around?

7 A No. I might have dropped
8 off -- sometimes the staff members will
9 drop off a folder or something for the
10 Governor. So I might have went inside to
11 drop off a folder, where there's like a
12 table, or we go to [REDACTED] and give
13 it to him. But I never walked in there.

14 Q At the holiday party that
15 you went to with [REDACTED], did the
16 Governor speak to you guys at the party?

17 A Yes. So the Governor gives
18 a speech. There's like a little fun
19 video that they play. And the Governor
20 basically works the room, takes a picture
21 with everyone who's there, no one
22 special, literally takes a picture with
23 everyone. There's a picture of me with
24 him, there's one with him, [REDACTED] and
25 myself. So just small talk, hey, how are

1 [REDACTED] [REDACTED]
2 you, take a picture and keep it moving.

3 Q Did you have any
4 conversations with the Governor after the
5 holiday party about [REDACTED]?

6 A Yes. So one day when I was
7 working the house, I was an overnight
8 shift. And I remember the Governor came
9 out of the residence early. So normally,
10 the travel team will work from 6 to 6 in
11 the morning, 6 in the morning until 6 at
12 night or 7 in the morning to 7 at night.
13 They adjust the tours, depending on what
14 his schedule was.

15 But I remember the Governor
16 came out early, just wanting to go to the
17 city. So the Governor hopped in the
18 Tahoe with me. We drive down to 633
19 3rd Avenue. He asked me, Who are you
20 close with on the detail? And I knew
21 what he was referring to because he
22 clearly saw me with [REDACTED]. I said [REDACTED]
23 [REDACTED]. And he goes, Yeah, don't
24 repeat our conversations with her, don't
25 tell her anything we talk about, as a

1 [REDACTED] [REDACTED]
2 matter of fact, don't tell anyone about
3 our conversations. And I was like, I
4 won't.

5 And I know prior to this,
6 when I was going down to the city with
7 him sitting at the house, you know, he
8 was asking about relationships. And he
9 asked me, Why would you want to get
10 married? And I was like, Oh, you know
11 because you love somebody. And he goes,
12 Oh, but it always ends in divorce, and
13 you lose money, and your sex drive goes
14 down.

15 And to me, it was almost
16 like he wanted me to elaborate on my sex
17 life which I didn't. I started talking
18 about marriage and the reason why you get
19 married. And that was kind of it. So
20 that was an uncomfortable conversation.

21 And then I felt like once I
22 went to the Christmas party, he realized
23 that I was close with [REDACTED], he tried to
24 like backtrack and say, basically, Don't
25 tell her anything that we talk about.

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And that kind of like resonated with me.

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Obviously, once we dropped him off at the

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city, I called [REDACTED]. She's like, Oh,

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you know, how was it? And I told her. I

6

was like, He asked me who I'm close with

7

and told me not to tell you anything.

8

She said, Why would he say that?

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Q Are there any other times

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the Governor told you not to talk about

11

anything he said to you?

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A No. Just that one time, I

13

would say, stands out to me.

14

Q Were there any other times

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where he spoke to you about your

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relationship status or asked about it?

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A Yeah. He would inquire, try

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to be like joking or playful. I never

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took it as anything serious. I just felt

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like he didn't know what else to like

21

talk about.

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Q Are there any times that the

23

Governor touched you?

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A Yes. So there were two

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significant incidents that really stand

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out to me. I don't know the exact date.

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But I know when I was sitting on the

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house and I was kind of assisting the

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travel team to try out, let's say, I was

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advancing 633, I had caught the Governor.

7

So he walked behind me. I went on an

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elevator with him. And I was like very

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focused on what I was doing. So I might

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had been like, Hey, good morning, sir,

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walked in front of him, brought him to

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the elevator. He walks into the

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elevator. Senior Investigator #1

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follows him into the elevator. I walk in

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the elevator. The elevator door closes.

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When you're in the elevator with the

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Governor, you stand in front of the door

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because if the elevator stops, I don't

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want anyone else to get it.

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So we ride the elevator up.

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And while we're heading from the first

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floor to the 39th floor, he runs his

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finger down the center of like my back on

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my spine, basically from the top of my

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neck, basically midway down with his

1 [REDACTED] [REDACTED]
2 pointer finger and just said, Hey, you.
3 So I turned around and said, Oh, hey, how
4 are you, sir? And that was basically it.
5 I kind of was like freaked out. I got a
6 little bit hot and nervous. We exit the
7 elevator. I opened the door to the 39th
8 floor, walked into his office. And that
9 was basically it. I walked down to the
10 38th floor where we have someone sitting
11 at the desk. At the time, it was Trooper
12 [REDACTED]. And he goes, What was
13 that? That was creepy. I said, Yeah,
14 that was creepy. I don't know what that
15 was and kind of played it off. [REDACTED]
16 Senior Investigator #1 [REDACTED] at some point was
17 near the 38th floor desk. And I said
18 something to [REDACTED]. I wouldn't say I was
19 reporting it. But I was kind of like,
20 Hey, did you see that? And he goes, Oh,
21 no. I was like, What? He just ran his
22 finger down the center of my spine, like
23 down my back. And he was like, Oh, no, I
24 didn't see it, I was sending a pin.

25 So like I stated earlier, we

1 [REDACTED] [REDACTED]
2 sent pins of the Governor's movements.
3 So it's out of the 633 or wherever he is.
4 So he was, I believe, sending a pin
5 because when I turned around, he said,
6 Hey, you. He was on the phone.

7 Now, did he see it out of
8 the corner of his eye? I don't know. At
9 the time, he stated that he didn't see
10 it. And that was kind of where it left
11 off.

12 Q Other than the conversations
13 you just described, did you talk to
14 anyone else about it around the time that
15 happened?

16 A Yeah. I told [REDACTED]
17 after. We were both like, that was
18 creepy. I think later on, I might have
19 mentioned it to a few teammates of just
20 like his behavior. But I don't really
21 remember, other than mentioning it to
22 [REDACTED] and [REDACTED] at the time.

23 Q And you said there was
24 another significant incident where the
25 Governor touched you?

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[REDACTED] [REDACTED]

A Yes. So it was September, I believe it was the 23rd, 2019. This is shortly after that I had been replaced by [REDACTED] as a driver. So I was advancing Belmont in Long Island. It was breaking ground for an Islanders event. And the Governor was leaving the event. And like I said, everything with the Governor is a very smooth transition. The doors are already open, the elevator's already there.

So I was holding a door for the Governor to exit back into the building. And as I'm holding the door, the Governor is walking almost through the door. And I think we might have had small words. I might have been like, Hey, have a good one. We acknowledged each other. And while he's walking and we're in motion, while he's walking into the door, he takes his left hand and basically like thumb facing down, I felt the palm of his hand in the center of my stomach on my bellybutton and like pushed

1 [REDACTED] [REDACTED]
2 back towards my right hip like where my
3 gun is. So he's walking one way, his
4 hand is running across my stomach in the
5 opposite direction. And [REDACTED]

6 [REDACTED] Senior Investigator #2 [REDACTED] was
7 the body guy that day and witnessed it.

8 Q And so the Governor was
9 coming, and you were facing the Governor
10 when this happened?

11 A I'm off to one side. And
12 the Governor -- we're not like
13 face-to-face. We're kind of just like
14 passing each other. I don't know if that
15 makes sense.

16 Q Were you on his left or his
17 right side?

18 A I'm on his left side.

19 Q He took his left hand and --

20 A Yeah, like pushed it this
21 way while he's walking the other
22 direction. So I felt like the palm of
23 his hand on my bellybutton and like
24 pushed back towards my right hip where my
25 gun is.

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Q When you say on your bellybutton, was your bellybutton in the center of his palm, below or above?

A No. I would say it was probably in like the center of his palm. And I felt the whole like hand almost on my stomach. And I felt like completely violated because to me, like that's between my chest and my privates, which, you know, if he was a little bit north or a little bit south, it's not good.

Q And you said that SI #2 was right behind him?

A Yes. SI #2 was the body that day and witnessed the incident.

Q And did you speak to SI #2 about it?

A Yes. We communicated after he checked on me. We were both like, What was that? I was like, I don't know. He asked me if I'm okay, if I wanted to do anything. I said, No, I'm all good. And that was it. I think we might have had a conversation the next day, again,

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2 kind of both still in shock about what
3 happened. And that was really it. I
4 left it at that. I wasn't saying
5 anything else, other than what it was.

6 Q Did SI #2 tell you
7 whether you should or shouldn't report
8 this?

9 A He left it up to me,
10 whatever you want to do. And from my
11 point of view, I'm a trooper, newly
12 assigned to the travel team. Do I want
13 to make waves? No.

14 And also, in the back of my
15 head, you know, Vinny had already
16 previously witnessed me being asked why I
17 don't wear a dress. So if the detail
18 commander is basically okay with that
19 behavior, you know, Vinny never even
20 checked on me or even said anything to me
21 after that, other than stays in truck,
22 don't repeat. I wasn't even trying to
23 put SI #2 in a position where -- you know,
24 I've heard horror stories about people
25 getting kicked off the detail or

1 [REDACTED] [REDACTED]
2 transferred over like little things, like
3 I'm not -- I had no plans to report it.

4 Q Did you discuss it at the
5 time with anyone else?

6 A Yeah. After the incident, I
7 told [REDACTED].

8 Q What was her reaction?

9 A She thought it was
10 disgusting. We were creeped out. But,
11 you know, I think for me, I kind of like
12 compartmentalized, it happened, I felt
13 uncomfortable, I felt completely
14 violated. But, you know, I'm here to do
15 a job.

16 Like I said, I'm a trooper.
17 I've been through high-stress, difficult
18 situations; you know, I wasn't going to
19 let that really, you know -- I tried to
20 brush it off and not let it affect me.

21 Q So you said you heard horror
22 stories of people being removed from the
23 detail over small things.

24 What horror stories had you
25 heard?

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[REDACTED] [REDACTED]

A I have heard -- again, rumor. I heard that there was a senior -- I don't know what year. But back in the day, there was a senior who again asked the Governor, Hey, do you have any plans later? And the Governor was like, Don't ask me what I plan on doing later. And then the senior tried to ask him another way, Hey, do you have plans later or whatever. And the senior was basically bounced out of the truck to like the tail com which is basically the person who works the radio in the tail car and transferred out. You hear people getting yelled at. It's just not something I was trying to explore.

And also, too, that August, there were troopers that were transferred out of PSU because they didn't report a fire to a sergeant, and the Governor kicked them off. And this is obviously a more serious situation. I just didn't want to put myself or SI #2 in a situation that we could be kicked off; you know,

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2 that's kind of like the culture that's
3 created within PSU.

4 Q Where was the fire?

5 A It was a few blocks from the
6 Governor's mansion. I don't know, the
7 trooper was going to send a notification
8 or if the Governor never found out about
9 it until it was on the news. And he got
10 upset that there was a fire a few blocks
11 away from the mansion. And he didn't
12 respond or do anything about it.

13 Q Did the Governor ever ask
14 you if you were pregnant?

15 A No.

16 Q Any other times that the
17 Giarro touched you?

18 A There was a time where the
19 Governor asked if he could kiss me. It
20 was in the summer. I believe I was still
21 the driver at the time. We were at the
22 Mount Kisco house. SI #2 was the senior
23 that day. There was a house trooper
24 there, Trooper [REDACTED]. The
25 Governor's walking down the driveway. I

1 [REDACTED] [REDACTED]
2 got out of the car to see if he needed
3 anything. And he just goes, Can I kiss
4 you? And I remember just freezing,
5 being -- in the back of my head, I'm
6 like, Oh, how do I say no politely
7 because in my head if I said no, he's
8 going to take it out on the detail. And
9 now I'm on the bad list.

10 So I kind of like froze and
11 just said sure and hesitated. He kissed
12 me on the cheek and just said after, Oh,
13 I'm not supposed to do that or unless
14 that's against the rules or something.
15 And I was like okay.

16 So after -- I don't know
17 where SI #2 was. I know [REDACTED]
18 witnessed it because after the fact, he
19 like made a joke, trying to play it off,
20 like, you know, I've been here for so
21 many years, and the Governor's never
22 asked to kiss me.

23 And after the incident, I
24 remember I told [REDACTED]. I said, Can you
25 believe that he asked to kiss me? Like I

1 [REDACTED] [REDACTED]
2 didn't know how to say no. And she was
3 like, Just tell him next time that you're
4 sick and you don't feel well. And I was
5 like, Oh, that's smart. I didn't even
6 think of that because it's kind of known
7 the Governor is a germophobe or doesn't
8 want to get sick. So I kind of kept that
9 in like the back of my head.

10 Q When he kissed you on the
11 cheek, did he put his hands on you
12 anywhere?

13 A No, not that I recall.
14 Maybe like my hands were on my side.
15 Maybe he like touched my forearms. I
16 don't recall. I know it wasn't on my
17 face or anything like that. It was just
18 a kiss on the cheek. And he kept walking
19 in, you know, the other direction.

20 Q So [REDACTED] then gave you this
21 advice for next time.

22 What happened then?

23 A So I kept that in the back
24 of my head. There was an event in
25 October. I forgot the exact date. I

1 [REDACTED] [REDACTED]
2 think it was approximately around like
3 the 23rd or somewhere around there. I
4 remember I had just gotten back from [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED] [REDACTED]. I was the tail
6 car. There was an event on West 116th.
7 I believe it was Low Memorial Library.
8 If we look up the Governor's schedule,
9 you could find it. I had just gotten
10 back from a trip from Croatia for two
11 weeks. The Governor gets out of the
12 suburban, I'm in the tail Tahoe; you
13 know, I gave the Governor like a little
14 wave of acknowledgment. And he comes
15 over to the Tahoe. I'm sitting in the
16 driver's seat. He's at the window; you
17 know, Where had you been? Told him I was
18 in Croatia. How was it? Small talk.
19 And he just goes, like looks at me and
20 says, Can I kiss you? And I said, No,
21 sir, I'm actually not feeling well. And
22 he looked at me, almost in disgust that I
23 had denied him. So he looks at me and
24 just like walks off. And I was like,
25 Okay, it is what it is. At least I got

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[REDACTED] [REDACTED]
out of that one. And I actually was sick
at the time.

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Q Were there any other
troopers standing around when that
happened?

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A I don't think anyone
witnessed or heard the conversation. The
advance guy was definitely outside, like
by the gate waiting for him. But he
wasn't within like an earshot of our
conversation. I don't remember who that
was. It might have actually been [REDACTED]
[REDACTED] because he had driven the
Governor from HPN Airport down to the
city. So I think it was a few days
before. And the Governor was like, Good
job driving the other day. So I'm pretty
sure [REDACTED] was advancing that
event and maybe a few other guys.

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Q And did you say when that
was?

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A I believe it was October
23rd in 2019, somewhere around that time.

Q Of 2019?

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A Correct.

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Q Did you tell [REDACTED] about

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that?

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A I did; you know, we just

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like played it off. She was like, Oh, it

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actually worked. She was like, you know,

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Don't worry about him.

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Q Did you tell anyone else

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about it?

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A That specific incident, I

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don't recall. I might have mentioned it

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to a few people. I might have even told

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[REDACTED], like, hey, yeah, he asked me again.

15

But I don't recall.

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Q Any other times where the

17

Governor touched you?

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A I believe he had like hugged

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me or like kissed me a few times, like in

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passing, but nothing that was like crazy

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that made me so uncomfortable. It might

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have just been like a greet when he was

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walking past me or something like that.

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But those were like the two significant

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that made me, you know, extremely

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uncomfortable and violated.

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Q Other than in Belmont, any other times where he touched you in your midsection or on your stomach?

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A No.

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Q Any conversations, other than what you've already described, where the Governor said something that you thought was not professional or inappropriate?

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A Yes. So there was one time where I was running errands with him within Mount Kisco. So it was after [REDACTED] had transferred over to be the driver because I remember they said, Hey, Trooper #1, he wants to run errands in town, can you drive? Because I worked the Mount Kisco residents. So I knew it better than [REDACTED] who had been working with the Lieutenant Governor. So if he wanted to go to a store, I knew where it was. I remember we were leaving the auto parts store, and he said, How old are you? Just looks at me and says, How old

1 [REDACTED] [REDACTED]
2 are you? I said, I'm 28, I'll be 29 in
3 [REDACTED] And he was like, Ha-ha, you
4 know, you're too old for me. Then he
5 asked, What age difference can I date
6 before people start saying things?
7 Meaning like age gap. And I said,
8 Probably older than your daughters. And
9 he said something that was kind of like
10 deflecting towards me. And I brushed it
11 off. And, you know, I said, I could be
12 your matchmaker, basically to take the
13 attention -- I don't remember what he
14 said exactly. But I wanted to deflect
15 the attention from me to something else.
16 And I said, I could be your matchmaker,
17 what are the requirements? Good-looking,
18 well-educated? And his response was, Can
19 handle pain. Then he stated, Oh, did you
20 see [REDACTED] and I broke up? There was
21 an article I believe in the New York Post
22 on page 6. And everyone knew they had
23 basically been done for a very long time.
24 But it was now out there in public. And
25 he's like, Did you see the article? You

1 [REDACTED] [REDACTED]
2 know, [REDACTED] and I broke up. I said, Oh,
3 I didn't see it, I didn't know, sometimes
4 change is good, try to play it off, and
5 he's like, What are the guys saying, you
6 know, about he and her breaking up? I'm
7 like, I haven't heard anything. And then
8 we were basically at the Mount Kisco
9 residence, and, like, that was it. But I
10 was like creeped out when he said "can
11 handle pain."

12 Q And what had you heard about
13 from the guys or the other female
14 troopers about his breakup? Anything
15 other than that they had broken up?

16 A So basically, even when I
17 got there in 2018, the relationship
18 between [REDACTED] and the Governor was
19 basically non-existing. [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] So it
was really no surprise to any of us. It
was just, like I said, out in the public.

Q Did any of the other
troopers tell you about anything why they
had broken up or anything along those
lines?

A No. It was just, they have
a very weird relationship. And I also
heard that there were times where -- I
believe [REDACTED] had an incident
where she had to pick up [REDACTED].
There was an event at One World Trade
Center, I think, for the anniversary for
9/11. And [REDACTED] was yelling at
[REDACTED] to bring her to Andrew, bring me to
him now. She notified whatever
supervisor was working and said, Hey,
[REDACTED] wants to see the Governor now.
The senior relayed that message to the
Governor. And he said, No, I don't want
her here, like I'll see her there, like
purposely staying apart or keeping her at
bay. Again, [REDACTED] had told me this.

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2 [REDACTED] [REDACTED]
3 Some of the details might be a little bit
4 different, but that's what I heard.

5 Q And did you tell anyone
6 about the conversation where the Governor
7 asked you about the age difference and he
8 wanted somebody who could handle pain?

9 A I had mentioned it to a few
10 people because I was like, I can't
11 believe this just happened. Again,
12 [REDACTED], I probably told, [REDACTED], [REDACTED] and a
13 few other people because, again, I just
14 couldn't -- like if I would tell
15 somebody, no one would believe this just
16 happened.

17 Q And when you told people,
18 did anyone tell you that they had
19 experienced anything similar or heard of
20 something similar?

21 A No.

22 Q Any other times the Governor
23 said something to you that you considered
24 unprofessional, inappropriate that
25 creeped you out, any or all of the above?

 A I think that's the bulk of

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things that creeped me out. There might
3 be some things that I might be
4 forgetting.

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Q Did the Governor ever make
any comments to you about tattoos?

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A No.

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Q And when you were covering
an event, did the Governor ever come over
to you or seek you out at events?

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A Yeah. So there was an
event -- this was like fairly recently.
I think it was this past January. It was
the Moynihan opening. It's connected to
Penn Station. I was advancing. I did
security because it was an active like
construction site. So there were still
like workers. There wasn't a part that
was finished. But I was on the upper
level, just, you know, doing securities,
making sure there was no pop-up protests
or anything like that.

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was advancing. They were coming up the
stairs. I was off to the side because
there were a few workers there. So I

1 [REDACTED] [REDACTED]
2 just want to, you know, keep them at bay
3 and making sure that they had a clear
4 exit. And the Governor like purposely
5 was like, Oh, hey you, Happy New Year,
6 and gave me like an elbow bump because
7 it's COVID time, and he's in front of
8 people. So he gave me like an elbow
9 bump. So that was that. He, again, went
10 out of his way to say hi.

11 There was also an event in
12 York College. I believe it was either
13 October or November. I can't remember
14 the day. It was this past winter. But
15 they opened up like a COVID vaccination
16 site. And I was outside security, making
17 sure that the motorcade had a clear exit
18 outside the drop. And I was on the
19 pedestrian path, again, making sure no
20 one walks in the way. And there was a
21 photographer there from The New York
22 Post. And as the motorcade's leaving,
23 now he drives himself. So you have the
24 lead car, and then you have the Governor
25 driving himself and then like a tail car.

So the lead car leaves. I'm outside the gate with the photographer. And the Governor just stops. He was like, Hey, you, and I like acknowledged him, Hey, how are you, sir? And turned opposite of him because that's where the photographer was. I want to keep my eyes on a potential threat, and he's still trying to talk to me. And, again, this is the New York Post who's not a fan of the Governor.

So, again, if a photographer can't get a good shot of him, like, you know, we did a good job. And he's just sitting there and just says, again, you know, Is he your own personal photographer? And I was like, No, sir. And he gave like The New York Post photographer a thumbs up and kept on driving.

Q Since COVID, has the Governor hugged or kissed you since the COVID restrictions came into play?

A Yes. Actually, this was

1 [REDACTED] [REDACTED]
2 like beginning of COVID. It was sometime
3 in March of 2020 before like the lockdown
4 and they really knew what COVID was. He
5 was landing at Farmingdale Republic
6 Airport. And the senior who basically
7 greeted him when he got off the plane
8 said that -- he went on the radio and
9 said, you know, he needs the restroom.
10 So [REDACTED] the driver, I'm in the
11 tail truck.

12 So the Governor follows me
13 to go into the bathroom, basically just
14 walk him there so he knows where he's
15 going. And he greets me with like an
16 awkward like half hug and like kiss on
17 the cheek. And I like joked and said,
18 You don't have COVID; right? And he was
19 like, Oh, no, stop. And then like, you
20 know, I walked him to the bathroom and
21 walked away. Again, this is before we
22 even really knew what COVID was. And
23 it's funny because I said something to
24 like [REDACTED]. And the Governor like
25 tweeted that day, Oh, I'm a hugger. And

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[REDACTED] [REDACTED]

we're like, Oh, is that in reference to me because like he literally hugged me, and COVID's going on. I forgot what exact date it was. But it was sometime in March. Again, it was an event in Farmingdale or he landed in Farmingdale. I don't know where the event was.

Q Do you recall what his tweet was other than I'm a hugger?

A Yeah. I think it was trying to calm people down about COVID, and everything's okay. And he said something like, Oh, I'm a hugger. It was like in a tweet.

Q Any other incidents that we haven't talked about yet that you can recall?

A No. I know I saw him a few times in like the summer at the mansion during COVID. And, like, he'd be leaving in his Bronco or whatever car it was. I would be in the parking lot, maybe leaving my car, like walking into the command center. And, like, as he was

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leaving, he would like reverse to like
come say hi to me, you know, so...

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Q Have you seen him do that
with any of the male troopers, like at an
event, head toward them or reverse course
to go chat with them?

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A No.

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Q Have any other troopers ever
commented to you that they noticed the
Governor seems to seek you out at events?

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A I don't think anyone
really -- well, actually, I remember that
event at Moynihan, Lieutenant [REDACTED]
was like, Oh, as soon as he sees you,
like he's in a good mood, or he'd beeline
right towards you, like he referenced
that he noticed it as well. And it's
kind of just like a known thing if he
sees a good-looking female, it like puts
him in a good mood. And within PSU, like
as soon as he gets in the car, how's his
mood today, how's his mood? Because, you
know, depending on his mood, it's going
to dictate how our day operates around

1

2 him.

3 Q Was there ever any talk,
4 anyone ever say to you that if he's in a
5 bad mood, it would be helpful to get him
6 to see an attractive woman?

7 A No. I never heard that. No
8 one said that directly to me. I know
9 [REDACTED] did make that comment to
10 [REDACTED] before because they used to call
11 her like the fourth daughter because the
12 Governor would give her a lot of
13 attention, like there were times when I
14 heard that she drove in his like GTO from
15 the Hamptons back to Mount Kisco, like
16 just them two, or he would just want to
17 drive in the tail car with her. So it
18 was kind of like, you know, she was on
19 the travel team for a while. Now she's
20 doing [REDACTED] [REDACTED] [REDACTED]. And I was kind
21 of like, you know, the new [REDACTED], someone
22 that he took a liking to or was on PSU
23 and put him in like a good mood or happy.

24 Q Who's [REDACTED] [REDACTED]?

25 A He's with -- I would say

1 [REDACTED] [REDACTED]
2 he's part of chamber. But he's kind of
3 like -- he does a lot of like personal
4 things for the Governor. I don't know
5 what his exact title is. But he does
6 like, let's say the Governor's having a
7 dinner at a restaurant, [REDACTED]
8 would basically be like the catch guy or
9 like walk him to his table, just kind of
10 like personal things for him. So, again,
11 [REDACTED] told me that information.

12 Q Did you ever observe
13 anything that would lead you to believe
14 that the Governor was having any romantic
15 or sexual relationship with anyone in the
16 executive chamber?

17 A I never witnessed any sexual
18 relationship or kissing like that. But
19 during COVID, Senior Staffer #1 [REDACTED] and
20 Senior Staffer #2 [REDACTED] were basically living at
21 the mansion. They were there from
22 basically March until that article about
23 the trooper dating [REDACTED] [REDACTED] came out.

24 So it was kind of like, I
25 think they were worried that people were

1 [REDACTED] [REDACTED]
2 going to start documenting or noticing
3 who's coming in and out. If they're not
4 leaving, you know, they're sleeping
5 there.

6 Again, could they had had
7 their own bedrooms? Of course. But no
8 one knows what's going on behind closed
9 doors. I know that they would be up at
10 the poolhouse in bikinis and bathing
11 suits. I don't really know anyone who
12 stays at their boss's house like that.

13 Q Did any other troopers ever
14 tell you they observed anything between
15 the Governor and Senior Staffer #1 [REDACTED],
16 Senior Staffer #2 [REDACTED] or anyone else in the
17 chamber?

18 A I had heard from [REDACTED]
19 Senior Investigator #1 [REDACTED] [REDACTED] that he once
20 witnessed the Governor and Senior Staffer #1 [REDACTED]
21 like making out on the sidewalk like they
22 were high schoolers. Again, he told me
23 this. I didn't witness this. I wasn't
24 even here at the time. But that's what I
25 had heard.

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Q Anything else you heard?

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A I had also heard that -- I

4

don't remember who it was from. I heard

5

a rumor that before Senior Staffer #1

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that the Governor and her were in

7

a hotel room by themselves for like an

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hour. And then one of the two left the

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room.

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Q And when you say

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do you mean like just before

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A Like the night before. And

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I think. I'm not really

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sure. Again, I wasn't working here at

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the time. But I heard that.

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Q Anything else you heard

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along those lines?

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A I had also heard that --

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again, rumor -- I heard that there was a

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guy named here. I don't know

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how to spell his last name. But he was

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driving once and saw Senior Staffer #1 and

24

the Governor like making out. He was in

25

the front seat. And Senior Staffer #1 was

1 [REDACTED] [REDACTED]
2 like sitting on the console kissing him.

3 Q Anything else?

4 A Not -- not much. I think
5 everyone kind of like assumes or thinks
6 that there's something going on between
7 them. Again, I never witnessed anything.
8 I'm sure there's other things out there.
9 But those are like the significant ones
10 that stand out to me that I had heard.

11 Q And have you had
12 interactions with Melissa DeRosa?

13 A Yeah. A few.

14 Q And what have your
15 interactions with her been like?

16 A For the most part, it was
17 just hi and bye. There was one time that
18 bothered me. I was the tail driver. The
19 Governor was going to an event at [REDACTED]
20 [REDACTED]'s house. He's like a big donor
21 for the Governor. He lives on like [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

23 And there's two entrances. There's an
24 entrance on one block and an entrance on
25 another. And at one entrance, there were

1 [REDACTED] [REDACTED]
2 protesters there. The other entrance was
3 secured where we could get to the
4 Governor in and out pretty safely. The
5 Governor was holding a few blocks away,
6 which means like, you know, he's not
7 ready yet. They pull the car over. And
8 they told me to go ahead with Melissa
9 DeRosa and Robert Mujica, who was in the
10 car with me. They said, Hey, drop them
11 off. They said drop them off where the
12 protesters are, basically to not give up
13 our secured location. So if I drop
14 Melissa and Mujica off at the secure
15 locations and a protester sees me, we
16 just gave away our secure entrance.

17 So I'm in the car with them.
18 And I think I might have mentioned, Hey,
19 there's protesters here or something.
20 We're going to use this entrance which I
21 probably shouldn't have even told her
22 that. But I was trying to be nice and
23 give her a heads up. And she goes, Why
24 are we using that entrance? Let's go to
25 the other one, basically trying to tell

1 [REDACTED] [REDACTED]
2 me how to do my job. My advanced guy,
3 who was [REDACTED], told me, like
4 they're using the protest entrance, the
5 Governor's using the safe one. And she
6 was questioning me. And she's like, Who
7 was advancing over there? Is the Wall
8 Street Journal or New York Times there?
9 We didn't know, like we can't have them
10 getting a picture of, you know, me and
11 Mujica walking in because he's the budget
12 guy going into the campaign event. It's
13 not a good look. It's optics.

14 So I'm like, I don't know
15 who's there. She's like, Get [REDACTED] on the
16 phone, like bossing me around. And I
17 felt annoyed because Number One, I heard
18 that you can't upset Melissa because if
19 you upset Melissa, the Governor's going
20 to take her side. And, again, you could
21 get shipped out. You don't know where
22 you're going to stand. So I'm like,
23 Okay, let's keep her happy so I stay in
24 the Governor's good graces. She told me,
25 Get the [REDACTED] on the phone. So now I'm

1 [REDACTED] [REDACTED]
2 thinking, oh, I don't want put [REDACTED] in --
3 you know, he sees Trooper #1 [REDACTED]
4 calling and Melissa DeRosa's on the
5 phone, that's not cool. So I think I
6 might have went on the phone before [REDACTED],
7 or I just gave Melissa DeRosa my phone,
8 and, you know, she had a conversation
9 with [REDACTED]. We ended up using the secure
10 entrance that was supposed to be for the
11 Governor. And that was really it; you
12 know, I called [REDACTED] after. And I
13 apologized and said, Hey, like, I didn't
14 want to put you in that situation. But,
15 like, I didn't know what else to do
16 without upsetting her. And he's like,
17 No, it's okay, I've dealt with her. He's
18 been around for a while. And he does a
19 lot of advances. He was okay with it.
20 But still, a civilian is telling me how
21 to do dignitary protection. So I, again,
22 felt like I was in an uncomfortable
23 situation where I had to basically choose
24 what I should be doing just to make this
25 woman happy.

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Q Any other incidents with
Ms. DeRosa where she was behaving
similarly or in some way that made you
uncomfortable?

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A No. For the most part, like
I said, it was very like short, sweet to
the point, not much conversation, other
than that one situation.

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Q Did you ever have any
interactions with Stephanie Benton?

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A Yes.

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Q And what were your
interactions with her like?

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A She was always polite and
kind to me. She's never given me
attitude or bullied me in any sense. She
was always very kind to me.

19

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Q Did you ever hear anyone use
the term "mean girls"?

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A Yes.

22

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Q And in what context did you
hear that?

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A I think when I first got to
the travel team and I was trying to

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figure out who was who with staff, you know, what their job was, it was kind of known that Melissa DeRosa, Stephanie Benton, Annabel Walsh and I believe Jill -- I forgot her last name.

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Q DesRosiers?

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A Yes, DesRosiers. They were like the four -- they were like a clique referenced as the mean girls. It was known they would kind of like bully and try to get what they want. Even on our side of things, I heard Annabel would always try to push for aviation to fly when they said it wasn't safe.

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Q Did you ever hear the Governor refer to them or any of them as mean girls?

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A No.

Q Since December of 2020, have any members of the executive chamber staff reached out to you to talk to you about working with the Governor?

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A No.

Q Have any lawyers from the

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2

executive chamber reached out to you at
any point?

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A No.

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Q Other than discussions with
Ms. Joslin or me, has anyone talked to
you about this investigation?

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A No.

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Q Has anyone else ever told
you that they had unpleasant or
inappropriate experiences with the
Governor?

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A Nobody directly conveyed
that to me. I did hear that there was a
trooper here, [REDACTED]. I think
when she was standing outside the booth,
outside the Governor's mansion, you know,
she was relatively new. I heard the
Governor made a comment, you know, If you
ever need anything, my bedroom's right
there, pointing to his room.

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So I think that's a little
bit inappropriate. Again, is his bedroom
up there? Sure. But he didn't have to
say it the way that he did. Again, she

1 [REDACTED] [REDACTED]
2 never told that to me. I had heard that
3 through other people. And I know that he
4 took a lot of liking or gave Trooper
5 [REDACTED] a lot of attention, would
6 always stop the car and talk to her. I
7 was never a witness to any of those
8 conversations. But pretty trooper,
9 that's squared away.

10 Q Is [REDACTED] still on the
11 PSU?

12 A No.

13 Q Had you ever talked to her
14 about leaving the PSU?

15 A I might have asked her why
16 she wants to leave. From what I had
17 heard, when she put in to come to PSU, I
18 believe Vinny Straface and other
19 commissioned officers promised her the
20 travel team. But she was assigned to the
21 command center in Albany. And I heard
22 that she had a desk job before becoming a
23 trooper.

24 So, again, she didn't get
25 the travel team like she was promised,

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and, you know, she didn't want to sit behind the desk for her career, wanted to go back out on the road.

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Q Had you ever seen the Governor hug or kiss any members of the executive chambers staff?

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11

A Not that I recall.

Q Had you ever seen the Governor hug or kiss members of the public?

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A I don't remember any specific incidents. I do know when I was working the Puerto Rican Day Parade, he interacts a lot with the crowd. So he might have kissed a few people on the cheek, taken a few photos, waved the flag.

19

20

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Q Did you ever see him do it where some of the persons he was hugging or kissing seemed uncomfortable?

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A No.

Q Did you ever see anyone sit on the Governor's lap?

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A No.

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[REDACTED] [REDACTED]
Q Did you ever hear any
stories about any women sitting on the
Governor's lap?

A No.

Q Did you ever witness or hear
about the Governor requiring staff
members to sing to him or memorize song
lyrics?

A No. There was a time that
the Governor was singing in the car with
me a few times. But he's never asked me,
or I never witnessed him ask anybody to
sing.

Q What was the Governor
singing when he was in the car with you?

A We were -- I was driving.
It was an event in Times Square. I don't
remember what the event was. There was
no supervisor in the car because the
Governor was finishing a speech. So it
was him and a staff member. And I
believe [REDACTED] was the body guy that
day. He was in the tail car. And he was
asking me -- there's a light that's in

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the suburban that's on the console. But you can kind of like rotate it. And he was asking me if I knew how to like dim the lights or change it. And I was like, You could only like manipulate or change the lighting on the dashboard. And he was singing that Meatloaf song, Paradise by the Dashboard Light. And then he was like teasing me that I was young, and I didn't know the song. And, again, I was focused on my task of driving, getting him there quickly.

14 So I wasn't really paying
15 attention to what he was saying. I think
16 he was trying to be funny. Again, if you
17 actually think about the lyrics, it's
18 kind of like explicit or sexual.

19 Q Did you ever hear the
20 Governor saying anything to somebody else
21 that was sexually suggestive?

22 A No.

23 Q Did anyone ever tell you
24 about him doing that with either other
25 troopers or staff members?

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[REDACTED] [REDACTED]
A I only heard that he really liked [REDACTED] and would kiss her on the cheek. But other than that, no.

Q Other than asking why you didn't wear a dress, did you ever hear the Governor making comments about other people's clothing or appearance?

A No. I remember one time -- because I was wearing a black suit, he told me I looked like an Amish person. This is in the elevator when I was catching him. Stephanie Benton was there. And he was like joking that my suit jacket was too big. And, you know, Stephanie was like, Oh, her jacket has to be big, she has her gun and radio and played it off that way. But, you know, you could also interpret it, Are you suggesting I wear tighter clothes?

So those were probably, you know, a few times he commented on clothing. And I remember one time when I was on the 39th floor with him, I was wearing a black suit, I said, Hey, do I

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look Amish today? You know. But him
commenting on anybody else's clothing,
you know...

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And did you notice that
there was any similar -- did the senior
women in the executive chamber dress
similarly or did they all have their own
style or did you make any observations
about that?

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I would say for the most
part -- I mean I know Melissa DeRosa wore
a lot of dresses and heels. Stephanie
wore heels. Annabel was always wearing
heels and, you know, like tight pencil
pants. But other than that, it was kind
of like businessy heels.

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Q

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Did you ever have any
interactions or know Charlotte Bennett?

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Yes. I do know her. She
sat at the desk outside the Governor's
office. And she was a very sweet girl.
A few interactions, but nothing like too
personal. Maybe small talk about his
schedule, things like that.

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Q Did she ever say anything to
you about what she was experiencing with
the Governor?

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A No.

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Q Did you know or ever
interact with Lindsey Boylan?

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A No. I never met her.

9

Q Did you ever know or
interact with Ana Liss?

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A No.

12

Q Did you know or interact
with anyone with the first name of
Kaitlin?

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A No.

16

Q Did you interact with any of
the Governor's executive assistants,
other than Ms. Bennett?

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A No, not that I could recall.

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Q After the stories started
coming out in the press about the
Governor's interactions with women, did
anybody tell you any stories about
anything else they had heard about?

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A No. I mean when it first

1 [REDACTED] [REDACTED]
2 came out, I immediately, you know,
3 thought of myself. I was like, oh, no.
4 But it kind of brought me back to when
5 the Governor told me, you know, don't
6 tell [REDACTED] anything I say. It was almost
7 like, What is he worried about, like a Me
8 Too movement? If I told her, she would
9 have a similar story? Or what the deal
10 was. But I didn't really think of
11 anybody else or hear of anything else.

12 Q After the stories came out
13 in the press, did any of your coworkers
14 reach out to you to say like, hey,
15 Trooper #1, this sounds like some of the
16 things I've heard, are you okay?

17 A Yeah. I know like [REDACTED]
18 [REDACTED], she reached out to me, [REDACTED]
19 [REDACTED], because I told him a lot of
20 my situations and like confided in him.
21 Obviously, [REDACTED], SI #2 and like SI #1. We
22 were just like, I can't believe this is
23 happening, you know. And I was like
24 hoping I wouldn't be, you know, put in
25 the situation because I was so worried

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[REDACTED] [REDACTED]
about exposing like myself and like my
privacy. But, you know, at the end of
the day, if I could help validate these
women, I think that's more important than
like my own, you know, personal life, I
guess.

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Q And just so you know -- and
I told this to Ms. Joslin beforehand --
what we told you the first time, we still
do not intend to use your name unless you
reach out to us and tell us you'd like us
to or you're going to The New York Times
or something else, we still have
discretion to try to keep some things
confidential.

17

A Thank you.

18

19

Q You mentioned that the
Governor now drives himself.

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When did that start?

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A The beginning of COVID when
the lockdown I guess started.

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Q Were there any other
situations you witnessed or heard about
where the Governor declined PSU coverage?

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[REDACTED] [REDACTED]

A Yeah. There were a few times. I remember he left early, the Mount Kisco house, to go to the Hamptons. And I followed him to the Mobil gas station when he first left. So basically, he pulls out of the driveway. He comes to the Tahoe and says, Hey, I'm good, you know, I don't want coverage. So it puts us in a position where we're like, well, we know what our job is. But this guy is telling you not to.

And at the time, we didn't really have a procedure or anything in writing about what our protocol was going to be. So, of course, I followed him to the Mobil. I was switching. We kind of like rotate, like, you know, we may sit for three hours, get a little break or do admin stuff. And I remember I was supposed to switch with [REDACTED]. So I think she met me at the Mobil while he was gassing up. And he apparently started driving to the Hamptons and told [REDACTED], I told you not to follow me.

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There are a few other

situations I heard that, you know, when he was leaving Mount Kisco, decline coverage, people still did it anyway.

And there was a bunch of times now here, he'd be walking his dog, Captain, and decline coverage. And now it's kind of like he had a conversation with the superintendent at the time, Vinny Straface, you know, about signing off that -- I guess liability in a sense.

Q Is there a procedure in place now for when the Governor declines coverage?

A Yup. So if he declines coverage, you don't follow him. You notify your supervisor. And I believe they log it somewhere and who was notified about the decline of coverage.

Q And has he ever declined coverage when he was with anybody else?

A I believe with his daughters for a few times, just for like privacy purposes. But I've never seen him with

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like a staffer or anything like that

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where he had declined coverage.

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Q And have any of the troopers

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who had been around for a long time told

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you whether any other prior governors

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ever declined coverage?

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A Not to my knowledge, no.

9

Q When the stories first

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started coming out about the Governor,

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did anyone in sort of your chain of

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command reach out to you to ask you about

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any experiences you've had with the

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Governor?

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A No.

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Q Since the stories came out

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in the press, have you interacted with

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the Governor?

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A No. I don't believe so. I

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think I've been in the Tahoe car for the

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most part. And when I see him, I

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purposely put my head down. I don't know

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if I'm just like paranoid. But I'd

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rather just not engage with him while all

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this stuff's going on. If I could stay

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off his radar, the better.

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Q Since all the stories broke, any incidents where he tried to seek you out at any time?

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A No. And actually, the day with the New York Post reporter where he was like, Hey, is he your personal photographer, that was the day that Lindsey Boylan's like op-ed, like explaining the details of her sexual harassment about the poker -- the strip poker on the state jet came out. It was that day. So since then, he was seeking me out when the photographer was there. I haven't spoken to him or like interacted with him.

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Q And if I told you that Ms. Boylan's detailed account came out on February 24th, does that sound about right when that event was?

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A Yes.

Q Is there anything you'd like to clarify or add to from the things we've talked about today?

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[REDACTED] [REDACTED]

A No. I do know that -- well, there's an Investigator [REDACTED]. I don't know what her -- she never confided in me. I don't know what her interactions were with the Governor. But I do know when she was a house trooper, I think she had like a problem with [REDACTED]. But she was basically sent from the house residence to the 633 office sitting at the desk. And then she got promoted to investigator, went to the dignitary squad which is basically visiting governors and VIPs. So I don't know. There's some whispers that she can't be around the Governor, what the situation is. I mean you would have to ask her. But, again, if something happened to her, she doesn't want to get involved. Just putting it out there.

Q Anything we asked about or not today, is there any statement you want to make on the record, something that we offer everybody, if you want to add anything?

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A Not that I could think of.

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Q I want to thank you for your time once again. If you come across any other documents -- we'll touch base with Lisa -- that would be relevant, we will be asking for those. And I hope we don't have to bother you again.

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A I'm happy I could help.

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Q This is nobody's idea of fun. So we thank you for your time. And, again, if anyone reaches out to ask you what we talked about, just let Lisa know.

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A Yeah. I know before I did this interview and when Lisa originally, you know, said, hey, you're going to go under oath, I did have to notify my supervisor. And I told him. I said, Hey, you know, I have to speak with the AG again. And he was inquiring, Hey, what's it about, did they tell you? And I didn't go into detail. I just said, I don't know, they just want to ask me a few more questions. And he was like, Oh,

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maybe you'll be the one who brings him

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down.

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So I think people kind of

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have an idea that something happened. I

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feel like they don't even want to ask

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because nobody wants to be in the line of

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fire of the Governor. Everyone knows

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he's very vindictive. And, you know, he

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hasn't met a grudge. I don't know.

What's the saying?

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Q

Who was the supervisor who

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asked what else we wanted to ask you

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about?

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A

Senior Investigator [REDACTED]

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[REDACTED]. And I already told Lisa. And

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I'm sure you've probably even heard it

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before. Everyone's just nervous,

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especially like even me. I'm nervous

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that the Governor's going to know I spoke

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out, and I'm going to be retaliated

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against; you know, I don't even trust my

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supervisors. And everybody, for the most

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part, gets promoted because they're in

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the good graces of the Governor.

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[REDACTED] [REDACTED]

So if they stay quiet or
give him information, they'll get
promoted, or something good will happen
to them. That's just like the culture
again in PSU. So it's very like
backstabbing, politics, so yeah.

Q I think we said this the
first time around, whether I did or not,
if anything happens to you, that you even
wonder if it's retaliation, let Lisa
know, and she will let us know because we
take that very seriously.

A Thank you.
(Continued on the following page.)

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MS. CLARK: Emily, is there
anything I missed?

MS. MILLER: I don't think
so.

MS. CLARK: Thank you again
so much. And good luck.

THE WITNESS: Thanks.

MS. CLARK: Bye.

THE VIDEOGRAPHER: The time
is now 3:36 p.m. And we are off the
record.

(Time noted: 3:36 p.m.)

Trooper #1 [REDACTED]

Subscribed and sworn to
before me on this _____ day
of _____, 2021.

NOTARY PUBLIC

I N D E X

E X A M I N A T I O N

EXAMINATION

Ms. Clark 4

E X H I B I T S

Exhibit	Description	Page
Exhibit 1	Subpoena	12
Exhibit 2	Announcement	25

*Exhibits retained by counsel

C E R T I F I C A T I O N

I, ANTHONY GIARRO, a Shorthand Reporter and a Notary Public, do hereby certify that the foregoing witness, Trooper #1 [REDACTED] Trooper #1 was duly sworn on the date indicated, and that the foregoing, to the best of my ability, is a true and accurate transcription of my stenographic notes.

I further certify that I am not employed by nor related to any party to this action.



ANTHONY GIARRO